TACOMA HOUSING AUTHORITY

BOARD OF COMMISSIONERS

BOARD PACKET

September 22, 2021

Tacoma Housing Authority

Executive Director
April Black

Board of Commissioners
Stanley Rumbaugh, Chair | Shennetta Smith, Vice Chair
Dr. Minh-Anh Hodge | Derek Young | Pastor Michael Purter

REGULAR MEETING
Board of Commissioners

WEDNESDAY, SEPTEMBER 22, 2021

The Board of Commissioners of the Housing Authority of the City of Tacoma will hold a Regular Meeting on **Wednesday, September 22, 2021, at 4:45 pm** via Zoom.

https://us02web.zoom.us/j/82833141392 / Meeting ID: 828 3314 1392 / Dial: (253) 215-8782

The site is accessible to people with disabilities. Persons who require special accommodations should contact Sha Peterson (253) 207-4450, before 4:00 pm the day before the scheduled meeting.

I, Sha Peterson, certify that on or before September 17, 2021, I FAXED/EMAILED, the preceding PUBLIC MEETING NOTICE before:

City of Tacoma	747 Market Street Tacoma, WA 98402 CityClerk@cityoftacoma.com	fax: 253-591-5300
Northwest Justice Project	715 Tacoma Avenue South Tacoma, WA 98402	fax: 253-272-8226
KCPQ-TV/Channel 13	1813 Westlake Avenue North Seattle, WA 98109	tips@q13fox.com
KSTW-TV/CW 11	2211 Elliott Avenue, Suite 200 Seattle, WA 98121	
Tacoma News Tribune	1950 South State Tacoma, WA 98405	

and other individuals and organizations with residents reporting applications on file.

_____

Sha Peterson
Executive Administrator

TACOMA HOUSING AUTHORITY

AGENDA
REGULAR BOARD OF COMMISSIONERS MEETING
September 22, 2021, 4:45 PM

Join Zoom Meeting
https://us02web.zoom.us/j/82833141392/ Meeting ID: 828 3314 1392 / Dial: (253) 215-8782

1. **CALL TO ORDER**
2. **ROLL CALL**

3. **APPROVAL OF MINUTES**
   3.1   Minutes of August 20, 2021—Special Session
   3.2   Minutes of August 25, 2021—Regular Session
   3.3   Minutes of September 10, 2021—Special Session
   3.4   Minutes of September 13, 2021—Special Session

4. **GUEST COMMENTS**

5. **COMMITTEE REPORTS**
   5.1   Real Estate Development Committee
   5.2   Finance and Audit Committee
   5.3   Community Partnerships and Advocacy Committee
   5.4   Education, Housing, Services and Partnerships Committee
   5.5   Diversity, Equity and Inclusion Committee (no regular meeting)

6. **COMMENTS FROM THE INTERIM EXECUTIVE DIRECTOR**

7. **ADMINISTRATION VERBAL REPORTS**
   7.1   Finance
   7.2   Administrative Services
   7.3   Client Support and Empowerment
   7.4   Rental Assistance
   7.5   Property Management
   7.6   Real Estate Development

8. **NEW BUSINESS**
   8.1   2021-09-22 (1) Cybersecurity Policy Approval for NIST 800-171 Compliance
   8.2   2021-09-22 (2) Utility Allowances Update
   8.3   2021-09-22 (3) Payment Standards Update
   8.4   2021-09-22 (4) Administrative Plan Update—EHV Program
   8.5   2021-09-22 (5) Housing Hilltop Design Build Contract
   8.6   2021-09-22 (6) Acquisition of Saravida
   8.7   2021-09-22 (7) Moving to Work Plan

9. **EXECUTIVE SESSION if any**
10. **COMMENTS FROM THE COMMISSIONERS**
11. **ADJOURNMENT**

TACOMA HOUSING AUTHORITY

MINUTES

TACOMA HOUSING AUTHORITY

BOARD OF COMMISSIONERS MEETING MINUTES
SPECIAL SESSION
FRIDAY, AUGUST 20, 2021

The Commissioners of the Housing Authority of the City of Tacoma met in Special Session via Zoom at 2:30 pm on Friday, August 20, 2021.

1. CALL TO ORDER

Commissioner Young called the meeting of the Board of Commissioners of the Housing Authority of the City of Tacoma (THA) to order at 2:31 pm.

2. ROLL CALL

Upon roll call, those present and absent were as follows:

PRESENT	ABSENT
Commissioners	
	Chair Stanley Rumbaugh
Vice Chair Shennetta Smith (Arrived late at 2:37 pm)	
Commissioner Derek Young	
Commissioner Dr. Minh-Anh Hodge	
	Commissioner Pastor Michael Purter
Staff	
	April Black, Interim Executive Director
Sha Peterson, Executive Administrator	
Julie LaRocque, Interim Deputy Executive Director	
	Richard Deitz, Interim Finance Director
Lorraine Viers, Human Resources Director	
	Frankie Johnson, Property Management Director
Roberta Schur, Interim Real Estate Development Director	
	Sandy Burgess, Administrative Services Director
	Aley Thompson, Interim Rental Assistance Director
Cacey Hanauer, Client Support and Empowerment Director	
	Katie Escudero, Interim Policy, Innovation and Evaluation Director

Commissioner Young declared there was a quorum present @ 2:32 pm and proceeded.

3.   OVERVIEW OF RECRUITMENT PROCESS

Commissioner Young provided an overview of the Executive Director search. The process included the hire of an Executive Search Firm, Stan Quy from The Organizational Leadership Edge (TOLE). There was a total of 18 applications and of the 18, 9 had zero housing authority experience. Of the 9, 4 had no senior leadership experience. This left the board with 5 candidates who were scheduled for a screening interview. The questions asked were based on feedback received from the Board of Commissioners in what they are looking for in an Executive Director. Of the 5 candidates, one dropped out, which left the board with 4 candidates. The board spoke to the 4 candidates in an hour-long interview.

Once the finalists are selected, the board will ask staff, community partners and the full Board of Commissioners to interview the candidates in a town hall style event, and one-on-one interviews. The board will then hold a special session to either hire the new Executive Director or define next steps. Director Viers' email to staff is a good summary of where everyone needs to be, according to Commissioner Young. The union has been invited to participate to make sure they are included as a major stakeholder. Director Viers is gathering names and contact information of key partners who will be asked to provide input. Over the next couple of days, Director Viers will work with departments to find out who will represent each department at the staff town hall event. According to Commissioner Young, the board needs to make a decision soon. Commissioner Hodge noted that the board has tried to be as inclusive and transparent and wants to include everyone in the open process so they can participate in one way or another. Commissioner Young added that more updates could have been provided, but with this type of screening he doesn't know how much more communication could have been provided. Mr. Quy will be able to walk through the different documents used for screening the candidates to allow everyone to see the background information and the Q&As which will be helpful.

4.   EXECUTIVE SESSION

The Board of Commissioners went into Executive Session at 2:43 pm for one hour and 12 minutes to evaluate the qualifications of four applicants for public employment. The board came back to regular session at 3:55 pm. There are background checks that are pending. Once that is finished, the board will make a motion at the next meeting with final candidates to interview.

10.   ADJOURNMENT

There being no further business to conduct, the meeting ended at 3:57 pm.

APPROVED AS CORRECT

Adopted: September 22, 2021

_____
Stanley Rumbaugh, Chair

TACOMA HOUSING AUTHORITY

BOARD OF COMMISSIONERS MEETING MINUTES
REGULAR SESSION
WEDNESDAY, AUGUST 25, 2021

The Commissioners of the Housing Authority of the City of Tacoma met in Regular Session via Zoom at 4:45 PM on Wednesday, August 25, 2021.

1. CALL TO ORDER

Chair Hodge called the meeting of the Board of Commissioners of the Housing Authority of the City of Tacoma (THA) to order at 4:53 pm.

2. ROLL CALL

Upon roll call, those present and absent were as follows:

PRESENT	ABSENT
Commissioners	
	Chair Stanley Rumbaugh
Vice Chair Shennetta Smith	
Commissioner Derek Young	
Commissioner Dr. Minh-Anh Hodge	
	Commissioner Pastor Michael Purter
Staff	
April Black, Interim Executive Director	
Sha Peterson, Executive Administrator	
	Julie LaRocque, Interim Deputy Executive Director
Rich Deitz, Interim Finance Director	
Lorraine Viers, Human Resources Director	
Frankie Johnson, Property Management Director	
Roberta Schur, Interim Real Estate Development Director	
	Sandy Burgess, Administrative Services Director
Aley Thompson, Interim Rental Assistance Director	
Cacey Hanauer, Client Support & Empowerment Director	
Katie Escudero, Interim Policy, Innovation and Evaluation Director	

Commissioner Hodge declared there was a quorum present @ 4:54 pm and proceeded.

3.   APPROVAL OF MINUTES OF THE PREVIOUS MEETING

Commissioner Hodge asked for any corrections to or discussion of minutes for the Regular Session of the Board of Commissioners for Wednesday, July 28, 2021. Commissioner Young moved to adopt the minutes. Vice Chair Smith seconded.

Upon roll call, the vote was as follows:

AYES: 3
NAYS: None
Abstain: None
Absent: 2

Motion approved.

4.   COMMITTEE REPORTS

Real Estate Development Committee—Chair Rumbaugh, Commissioner Young
The committee met but Commissioner Young was unable to attend. Interim Executive Director Black stated that the topic of the meeting was to consider an acquisition, but the committee decided not to pursue it and have informed the owners.

Finance Committee—Commissioner Hodge and Commissioner Young
The committee did not meet but had an introductory meeting with the auditors to get things started.

Education, Housing Services and Partnerships Committee—Vice Chair Smith, Commissioner Hodge
The committee met on August 17. The committee will have a recommendation in October about different voucher programs.

Community Partnerships and Advocacy Committee—Vice Chair Smith, Commissioner Purter
The committee did not meet but will schedule a time to have a conversation.

Diversity, Equity and Inclusion Committee—Vice Chair Smith, Commissioner Hodge
The committee met on August 17. The main topic was information that was already presented to the board. The committee also spoke about the RFP for the Diversity, Equity and Inclusion Consultant. Staff did a great job. Interim Executive Director Black reached out to the stakeholders to provide input. The RFP is due September 6. The committee also discussed the ED search and heard concerns for a need for more open and frequent communication, so everyone is on board regarding the status of the search. This has been addressed.

5.   COMMENTS FROM THE EXECUTIVE DIRECTOR

Interim Executive Director (ED) April Black directed the board to her report. THA issued a Request for Proposal (RFP) for a Diversity, Equity and Inclusion (DEI) Consultant. Proposals are due September 6 and updates will be provided to the board. The DEI committee will be deeply involved with the process. THA is working through the 2022 budget but is not ready to review them yet with the board. The Leadership Team is working on priorities as an agency and departments and will provide this to the board in September and a draft budget later. Staff are tracking the federal budget which looks positive for housing. A bill passed yesterday with additional funding for housing. Interim Rental Assistance Director, Aley Thompson led discussions with Pierce County Housing Authority (PCHA) to share jurisdiction for emergency housing vouchers. That agreement was signed today. Interim ED Black's report has additional information regarding how THA is investing to emergency housing. Real Estate Development's report includes information on tiny home village at Hillsdale Heights. The city is relocating it to another parcel on the east side that will be vacated. The city is open to hosting temporary shelter or micro home village at THA's bullpen site. The site was showed to the city last week and they are interested. The site can hold 16 households for the winter. THA provided a draft lease so the city can do community outreach and fund a service provider. The final Arlington Drive tour is scheduled for September 8.

6.   ADMINISTRATIVE REPORTS

Finance

Finance Department (FD) Interim Director Rich Deitz directed the board to the finance report. Staff are working on the 2022 budget and the 2020 audit. The auditors started significantly later than they have started in prior years. THA continues to be in good shape. THA Cash is up. The next Cash Report will be in August. Housing and Urban Development (HUD) held is up $1.8M. THA Unencumbered cash is at $1M which is up. The increase relates to waterfall payments.

Commissioner Young moved to ratify the payment of cash disbursements totaling $6,832,864 for the month of July 2021. Vice Chair Smith seconded.

Upon roll call, the vote was as follows:

AYES: 3
NAYS: None
Abstain: None
Absent: 2

Motion Approved.

Policy, Innovation and Evaluation

Policy, Innovation and Evaluation (PIE) Interim Director Katie Escudero directed the board to her report. A new staff member, Christine Nguyen joined PIE early this month. She comes with technical and subject-matter expertise. Since THA's Board took action to impose a moratorium on time limits and non-housing related program requirements, 62 new students have been housed off the waitlist. 85% of current voucher holders are in compliance with program requirements, despite the waiver of non-housing related program requirements and moratorium on time limits. One significant finding is that roughly three quarters of HOP households exit before reaching the five-year time limit. To understand what factors influenced a household's length of stay, PIE staff conducted a review of a random sample of 50% of the households that entered in 2012 and later and exited between 2018-2020. Commissioner Young thinks it's great data. He likes seeing what is going on. Commissioner Hodge asked for deeper demographics of recipients on future reports and to share the screen so people can follow. Vice Chair Smith thanked Interim PIE Director Escudero for a great job.

Administrative Services

Administrative Services (AS) Director Sandy Burgess was not in attendance. AS Department Manager, Karen Bunce addressed the board on her behalf. Per Unit Per Year (PUPY) for the first of 2021 looks good across the portfolio with a few exceptions. Expenses are for Renew Tacoma, Dixon for water damages and elevator work. THA started the elevator work across the portfolio. Bay Terrace continues to run higher on maintenance. Outrigger had plumbing issues. Karen welcomed THA's new Fair Housing Compliance Specialist Julie Nelson. She comes from Fair Housing Center in Washington. Karessa Bowman is working on insurance renewals, which has been strained by Covid, natural disasters and cyberattacks. THA continues to litigate risks. The cost of damages has increased from 2020, mostly related to water damage. THA has been a victim of catalytic converter thefts (5 total this year). The highest incident report continues to be elevators. Sandy Bigelow is busy with contracting, pursuing grant opportunities and a low-cost loan from Amazon Housing Equity Fund. An RFP is out for a banking partner at the Family Investment Center at Salishan.

AS Associate Director and CIO William Morse addressed the board. The Leadership Team chartered a new group called the IT Advisory Committee (ITAC) made of representatives from THA. There are 12 members who meet twice monthly to discuss IT initiatives. Currently the committee is working on OpenDoor Review, Cloud Migration and Security. The ITAC chartered a fit gap report to see if THA needs to purchase Yardi and had IT demos. The demos were well attended and received. There are follow-up demos for deeper dives of the system. With collaborative effort with PIE, ITAC will review all materials in September and target a date recommendation to the Leadership Team as early as October. THA is moving from locally hosted to internet hosted Cloud Migration. AS is working on policies related to security and taking practical steps making sure laptops are encrypted. The team will also be deploying MS security tools and

renewing them in the best way possible, looking at password management and signage sign on.

Client Support and Empowerment

Client Support and Empowerment (CSE) Director Cacey Hanauer directed the board to her report. CSE has a new staff member, Leslie who is from the Korean Women's Association. CSE will also be hiring a new Family Self-Sufficiency staff at the end of the month. CSE staff continue to work with relationship building. Staff are implementing programs like Coffee and Donut in the senior buildings and Movie Night at Salishan. CSE is starting to see an uptick in crisis which is not uncommon for this time of year. Staff are focusing on staff retention and well-being. According to Vice Chair Smith people are going through crisis with the autumn season and asked if THA has a relationship with any mental health organizations to support clients. According to Director Hanauer, THA has several relationships with mental health organizations throughout the city. Different organizations meet different needs. There are a lot of good referrals and resources she added. Staff tend to work one-on-one with residents for the best resource for them. Commissioner Hodge asked if there has been a need to engage interpreters and how clients may access that service. THA departments engage with interpretation services regularly. Director Hanauer added that THA has been focusing on hiring multi-lingual individuals.

Rental Assistance

Rental Assistance (RA) Interim Director Aley Thompson directed the board to her report. RA staff continue to be preoccupied with Emergency Housing Voucher (EHV). The waitlist that Pierce County is operating is live as of two weeks ago with 40 people. Kudos to Amber Prentice who is leading the work and maintaining strong relationship with partners. RA staff worked overtime to continue to get rent increases processed. The inspections team is back out in the field and Adam Ydstie received an email from a client that praised THA for its flexibility. Inspectors are also using Facetime to do inspections. Staff are adapting their work to keep them and clients safe. Pierce County continues to administer late rent funds. This will be available for a few years. THA submitted an application for $3M with a goal of serving 1,500 families. Thanks to Alexis Eykel, THA hosted a landlord symposium in partnership with King County Housing Authority (KCHA), Seattle Housing Authority (SHA), and Renton Housing Authority (RHA). Vice Chair Smith stated that it is good to know that staff was able to contact landlords to get them together. She has known that it has been hard to find housing with vouchers due to the negative connotations that goes along with having a voucher. Interim RA Director Thompson responded that hiring housing navigator will continue those relationships with landlords. Commissioners Hodge and Young mentioned how a lot of work went into this work.

Property Management

Property Management (PM) Director Frankie Johnson directed the board to her report. She focused on the PUPY numbers and emphasized that all properties, with the exception of Bay Terrace were under budgeted amount in actual spending. Bay Terrace had 3 floods that caused significant expenses. Director Johnson gave kudos to her Bay Terrace team for handling the flood and also thanked her whole PM staff on continuing to work on the numbers. PM staff will resume 10% audit which will allow staff to review twice as many files. Two years ago, PM talked about installing fire stops to avoid the significant amount of expense due to fires. Staff are not seeing as much fire damage. July was a hot month, and PM staff had to work with 90+ heat which really stretched staff. Great job to the PM team! PM will be filling a vacancy after losing Lester Pogue to RED. THA is approaching one year anniversary of the first unit leased at Arlington. Director Johnson invited Sherri Tift and Marquis Jenkins to provide an overview of what they have been doing at Arlington. According to Marquis, there are individuals leasing units for the first time and learning the paperwork process. Staff continue collaboration with YMCA staff to support the households. Sherri noted what a joy it is to work at Arlington; she loves the partnerships with the Y. Arlington had a community block party for the whole Arlington campus in July during a time when Covid was lifting a bit. The event got residents together to remind them of the services available to t hem and start getting them together as a community. The event turned out well. Director Johnson added that Arlington is a different from other communities managed by THA, but they are doing a great job. Commissioners Hodge and Young thanked and gave kudos to the staff.

Real Estate Development

Real Estate Development (RED) Interim Director Roberta Schur directed the board to her report. Lester Pogue started a new position with RED. The team had an in-person meeting and was able to meet Les. James Center North has two parcels listed for commercial property. The hope is to get proposals as early as September. The team is doing activation work and there will be a small event on Saturday. Arlington and the Rise have been operation for almost a year now. This past weekend, along with the Hilltop Action Coalition Hilltop had a summer splash. It was a nice event. The RED team is finalizing plans with Hilltop Property to close on that transaction by March or early April.

7.   NEW BUSINESS

8.1   RESOLUTION 2021-08-25 (1)
Amendment to 902 1ˢᵗ Floor TI Construction Contract

A **RESOLUTION** of the Board of Commissioners of the Housing Authority of the City of Tacoma

WHEREAS, Electrical and low voltage code compliance upgrades were discovered during the 902 1ˢᵗ Floor construction; and

---

WHEREAS, THA's IT staff determined the installation of new low voltage and server room materials will enhance the service and longevity of the data systems; and

WHEREAS, In order to meet code compliance and preserve and enhance data system service; now, therefore, be it

Resolved by the Board of Commissioners of the Housing Authority of the City of Tacoma, Washington as follows:

Increase the construction contract and budget $103,000 to a total amount of $853,000 and bring the overall 902 improvements budget to $1,603,000.

Commissioner Young motioned to approve the resolution. Vice Chair Smith seconded the motion.

AYES: 3
NAYS: None
Abstain: None
Absent: 2

Motion Approved: August 25, 2021   _____

                                            Stanley Rumbaugh, Chair

8.   EXECUTIVE DIRECTOR SEARCH OVERVIEW

Commissioner Young provided an overview the executive director search process with the consultant:

- The board discussed leadership styles, real estate development experience, and strategic background.
- The consultant recruited the top candidates and received 18 candidates.
- The board reviewed all 18 resumes and of the18, 8 had no affordable housing experience, and 5 had no leadership experience.
- 5 had HUD or housing leadership experience. Of the 5, one dropped out
- The board decided to interview the 4 remaining candidates.
- The board had a meeting last week to over the candidate qualifications.
- The board will have an executive session today to determine the candidates for the final 2 or 4.
- The process will include staff, the community partners and the full board.
- HR Director Lorraine Viers sent an email to staff with information regarding the townhall event. She also reached out to the unions to invite them to participate.
- At the end of the full board interview, the board will go over the feedback from everybody and go into special session to determine next steps.

- Lorraine Viers is gathering up a list of community partners from the Leadership Team to invite to the townhall. She will send the list to the board to pick who needs to be on the focus Key Partners panel.

9.   EXECUTIVE SESSION

The board went into executive session at 6:13 pm for 13 minutes to discuss the ED candidate qualifications and came back into regular session at 6:26 pm.

Based on the qualifications reviewed by the board, Commissioner Young motioned to nominate John Hall from Indianapolis Housing Authority, Brian Gage from the Metropolitan Housing Authority and HUD, and April Black who has been Interim Executive Director for Tacoma Housing Authority to be interviewed. Vice Chair Smith seconded. Unsuccessful candidates have been informed.

10.   COMMENTS FROM THE COMMISSIONERS

Commissioner Hodge thanked staff for their work on the ED search.

10.   ADJOURNMENT

There being no further business to conduct the meeting ended at 6:31 pm.

APPROVED AS CORRECT

Adopted: September 22, 2021

_____
Stanley Rumbaugh, Chair

TACOMA HOUSING AUTHORITY

BOARD OF COMMISSIONERS MEETING MINUTES
SPECIAL SESSION
FRIDAY, SEPTEBMER 10, 2021

The Commissioners of the Housing Authority of the City of Tacoma met in Special Session on September 10, 2021, at 1:00 pm at the Family Investment Center 1724 East 44th Street, Tacoma, WA 98404 and via Zoom to discuss the qualifications of the Executive Director candidates.

1.   CALL TO ORDER

Chair Rumbaugh called the meeting of the Board of Commissioners of the Housing Authority of the City of Tacoma (THA) to order at 4:10 pm.

2.   ROLL CALL

Upon roll call, those present and absent were as follows:

PRESENT	ABSENT
Commissioners	
Chair Stanley Rumbaugh	
Vice Chair Shennetta Smith	
Commissioner Derek Young	
Commissioner Dr. Minh-Anh Hodge (arrived late at 1:14 pm)	
Commissioner Pastor Michael Purter	
Staff	
April Black, Interim Executive Director	
Sha Peterson, Executive Administrator	
Julie LaRocque, Interim Deputy Executive Director	
Richard Deitz, Interim Finance Director	
Barbara Tanbara, Interim Human Resources Director	
Frankie Johnson, Property Management Director	
Roberta Schur, Interim Real Estate Development Director	
Sandy Burgess, Administrative Services Director	
Aley Thompson, Interim Rental Assistance Director	
Cacey Hanauer, Client Support and Empowerment Director	
Katie Escudero, Interim Policy, Innovation and Evaluation Director	

Chair Rumbaugh declared there was a quorum present @ 4:11 pm and proceeded.

3. EXECUTIVE DIRECTOR CANDIDATE INTERVIEWS

The board interviewed each candidate in-person and via Zoom.

4. EXECUTIVE DIRECTOR QUALIFICATIONS

The Board of Commissioners went into Executive Session at 4:29 pm for 1 hour and 8 minutes to discuss the Executive Director qualifications and came back into regular session at 5:37 pm.

Based on the board discussions and candidate qualifications, Vice Chair Smith motioned to hire John Hall as Tacoma Housing Authority's next Executive Director. Commissioner Young seconded the motion.

Upon roll call, the vote was as follows:

AYES: 3
NAYS: 2
Abstain: None
Absent: None

Motion Approved: September 10, 2021

_____
Stanley Rumbaugh, Chair

5. COMMENTS FROM COMMISSIONERS

None.

10. ADJOURNMENT

There being no further business to conduct, the meeting ended at 5:40 pm.

APPROVED AS CORRECT

Adopted: September 22, 2021

_____
Stanley Rumbaugh, Chair

TACOMA HOUSING AUTHORITY

BOARD OF COMMISSIONERS MEETING MINUTES
SPECIAL SESSION
MONDAY, SEPTEBMER 13, 2021

The Commissioners of the Housing Authority of the City of Tacoma met in Special Session on September 13, 2021, at 4:00 via Zoom to discuss the qualifications of the Executive Director candidates.

1.   CALL TO ORDER

Chair Rumbaugh called the meeting of the Board of Commissioners of the Housing Authority of the City of Tacoma (THA) to order at 4:10 pm.

2.   ROLL CALL

Upon roll call, those present and absent were as follows:

PRESENT	ABSENT
Commissioners	
Chair Stanley Rumbaugh	
Vice Chair Shennetta Smith	
Commissioner Derek Young	
Commissioner Dr. Minh-Anh Hodge (arrived late at 1:14 pm)	
Commissioner Pastor Michael Purter	
Staff	
April Black, Interim Executive Director	
Sha Peterson, Executive Administrator	
Julie LaRocque, Interim Deputy Executive Director	
Richard Deitz, Interim Finance Director	
Barbara Tanbara, Interim Human Resources Director	
Frankie Johnson, Property Management Director	
Roberta Schur, Interim Real Estate Development Director	
Sandy Burgess, Administrative Services Director	
Aley Thompson, Interim Rental Assistance Director	
Cacey Hanauer, Client Support and Empowerment Director	
Katie Escudero, Interim Policy, Innovation and Evaluation Director	

Chair Rumbaugh declared there was a quorum present @ 4:11 pm and proceeded.

3. EXECUTIVE SESSION

The Board of Commissioners went into Executive Session at 5:36 pm for 35 minutes to discuss the Executive Director qualifications and came back into regular session at 6:11 pm.

The board will collect additional comments from staff and the community until September 27th. An online portal to submit comments will be created. Comments and questions may also be sent to THA's Executive Administrator, Sha Peterson at speterson@tacomahousing.org.

4. COMMENTS FROM COMMISSIONERS

None.

10. ADJOURNMENT

There being no further business to conduct, the meeting ended at 6:12 pm.

APPROVED AS CORRECT

Adopted: September 22, 2021

_____
Stanley Rumbaugh, Chair

TACOMA HOUSING AUTHORITY

Real Estate Development Committee
Chair Stanley Rumbaugh
Commissioner Derek Young

Finance Committee
Commissioner Derek Young
Commissioner Minh-Anh Hodge

Community Partnerships and Advocacy Committee
Vice Chair Shennetta Smith
Commissioner Pastor Michael Purter

Education, Housing, Services and Partnerships Committee
Vice Chair Shennetta Smith
Commissioner Minh-Anh Hodge

Diversity, Equity and Inclusion Committee
Vice Chair Shennetta Smith
Commissioner Minh-Anh Hodge

TACOMA HOUSING AUTHORITY

COMMENTS FROM THE EXECUTIVE DIRECTOR

TACOMA HOUSING AUTHORITY

To: THA Board of Commissioners
From: April Black, Acting Executive Director
Date: September 22, 2021
Re: Executive Director's Monthly Report

The Executive Director report serves as a summary of high-level agency activities. It supplements the departments' written reports.

1. Diversity, Equity, and Inclusion

THA called for proposals for a Diversity, Equity, and Inclusion consultant to evaluate THA. Proposals were due September 6th. We have asked for staff volunteers to review and score the proposals. We will share the top-scoring proposals with the Board DEI Committee. We hope to have a bidder selected by mid-October.

2. THA Budget and Federal Funding

2.1. 2022 THA Budget

The 2022 Budget preparation is in full swing. We want that budget to reflect agency priorities. I have attached the list of priorities the Leadership Team is proposing.

During the Board meeting on September 13th, some members of the Board expressed disappointment with the current agency trajectory and THA priorities. I would strongly encourage the Board to share their expectations with the staff and Leadership Team. We have attempted to set the proposed priorities for the coming months, moving into 2022. Budgets and work plans are being developed off these priorities. If the Board plans to redirect this work, please let the staff know now.

2.2. FY22 Federal Budget

We have been monitoring the *Build Back Better Act* funding package. As part of this proposed $3.5T funding package, we are particularly interested in housing funding.

The House Financial Services Committee released its $330 billion affordable housing title earlier this week. According to a summary provided by the National Low Income Housing Coalition (NLIHC), the bill includes:

- $80 billion for public housing preservation, creation, energy and water efficiency, and climate resiliency improvements, and removal of health and safety hazards, including:
  - $10 billion for the Public Housing Capital Fund;
  - $66.5 billion for priority investments to repair, replace, and construct properties; and

- o $2.75 billion for competitive grants to local governments and public housing authorities for affordable housing needs and community development and revitalization;

- $75 billion for Housing Choice Vouchers, including:
  - o $25 billion for tenant-based rental assistance for households at risk of homelessness, survivors of domestic violence, and victims of human trafficking;
  - o $500 million for competitive grants to public housing agencies for mobility-related services; and
  - o $500 million for tenant protection vouchers;
- $35 billion for the HOME Investment Partnerships Program;
- $15 billion for Project-Based Rental Assistance;
- $3.1 billion to the Minority Business Development Agency (MBDA) to support research, provide grants, and promote the growth and competitiveness of minority-owned businesses and enterprises.

Congress has reconciliation deadlines in September. We will continue to watch as the package makes its way through committees.

3. **Discussions Regarding Pierce County Housing Authority**

I continue to meet regularly with the Pierce County Housing Authority Executive Director, Jim Stretz. He also participated in the community interview of the THA Executive Director finalists. We both remain committed to working together in the best interests of the customers each agency serves.

We will meet with Jeff Robinson from the City of Tacoma in early October. Jeff was involved in the analysis and discussion of the Bremerton-Kitsap merger in 2006. We will seek his advice on what the agencies should analyze and when to engage the stakeholders should Pierce County government continue to push for these discussions.

4. **Vaccine Mandate**

On August 27th, I notified all staff that THA would be implementing a vaccine mandate. We had an all-staff meeting on September 2nd to discuss staff questions and concerns. I shared those questions with staff and the Commissioners on September 9th.

Our next steps include the following:
- Draft a policy by 9/15
- Discuss the draft policy with the two labor unions by 9/21
- Finalize the policy
- Implement the final policy and set a date by which staff must show proof of vaccination.

In discussions with staff and in reading about other organizations' implementation of similar policies, we can anticipate sticking points around:
- What qualifies as an exemption?

- What severance is available to people that choose to leave because of this policy?
- How will THA maintain its operations if many staff choose to leave?
- What safety measures will THA implement if exempted/unvaccinated staff are in THA offices and/or interacting with THA customers?

We will be proposing answers to these questions within our draft policy and negotiating the impacts with the labor unions over the coming weeks. It is possible we will need a Special Board Meeting in order to review and approve the final policy.

5. Tour of Arlington Drive

On September 8th, we hosted Congressman Adam Smith, other elected officials, and community champions of Arlington Drive for a tour and discussion about the property. Commissioner Young was also able to join us. We heard strong support for the property and gratitude to THA and the Board for pushing to make that property a success. We also heard from State legislators that the 2021-2023 $4.5M biennium support for the supportive services on the property would likely not be renewed in future State budgets. Our State elected officials strongly advised us to begin looking for other sources of support services funds. Securing replacement funds of this scale will be a difficult task. THA should start working on this now.

6. Change in HR Staffing

THA's Director of Human Resources, Lorraine Viers, resigned this month. Our recently retired Director of Human Resources graciously agreed to return to THA on a limited basis to help THA through this transition. I am grateful to Barbara Tanbara for taking the break from her retirement to rejoin us. She jumped in immediately to help with the final stages of the Executive Director search and will help support and guide the HR team during this transition. We will await the new Executive Director before reposting and rehiring this position.

I also want to acknowledge Sha Peterson. Sha shouldered much of the ED interview scheduling and coordination burden. She did a great job pulling people together.

Proposed 2021-22 Priorities

September 11, 2021

Prioritized Values for 2021-22

- Incorporate DEI in all THA work
- Support staff and make THA a place where people belong and are valued by people
- Provide excellent customer service for internal and external customers
- Break down silos within the agency
- Increase affordable housing in Tacoma using all available means
- Align THA's goals and strategies with greater community goals.
- Realign THA departments, positions, etc to meet the goals of the community and agency, support staff, reduce redundancy, and offer clearer lines of responsibility and authority.
- Refine education project—relationships with institutions/students/property owners, clear and measurable goals, simplify so work can be embedded in THA programs.
- Renew overt goals related to Section 3—THA hiring, CSE priorities, all development projects.
- Maintain 99% occupancy in the portfolio.
- Fully utilize Emergency Housing Voucher funds.
- Maintain financial sustainability.

2021 Tasks/Goals

October

*Welcome and onboard new THA Executive Director

*Begin DEI Analysis

*Implement Vaccine Policy

*Begin implementing cyber security policies/procedures/practices

*Launch Business Process Improvement Project

November

*Make recommendation about DOC-CHAP set-aside

*Formalize acquisition and development process

*Update 3-year forecasting tool

*Operationalize Foster Youth Initiative (FYI) vouchers, if awarded

*Go live with new THA website

December

*Award at least 50 new PBV-VASH, PBV or PBS into existing housing immediately available to households exiting homelessness

*Make a decision about software

*Acquire one new residential property

*Make decisions about THA reopening and finalize a Telework policy

2022 Priorities and Tasks

Tasks that occur throughout the year:

*Implement software migration and address software gaps.

*Acquire units and partner to finance housing

*Implement DEI Recommendations

*Remain ready for PCHA Merger Discussions

- **By March 31, 2022**
  - Deploy Eviction Prevention Program
  - Launch new IT ticketing system
  - Launch Laserfiche documents management system
  - Make final decisions about changes to HOP, CHAP and CHOP. Implement any changes
  - Fill staff vacancies

- **By June 31, 2022**
  - Break ground on Housing Hilltop

TACOMA HOUSING AUTHORITY

ADMINISTRATION
REPORTS

TACOMA HOUSING AUTHORITY

FINANCE

TACOMA HOUSING AUTHORITY

Motion

Adopt a consent motion ratifying the payment of cash disbursements totaling $6,073,582 for the month of August 2021.

Approved: September 22, 2021

_____
Stanley Rumbaugh, Chair

TACOMA HOUSING AUTHORITY
Cash Disbursements for the month of August 2021

		Check Numbers			
		From	To	Amount	Totals
A/P Checking Accounts					
Accounts Payable Checks	Check #'s	**95,055** -	**95,125**		
Accounts Payable ACHs	ACHs	**748** -	**791**		
Business Support Center				250,349	Program Support
Moving To Work Support Center				50,647	
Moving To Work Buildings (used by Support Center)				15,977	
Tax Credit Program Support Center				26,844	
Section 8 Programs				142,850	Section 8 Operations
Alberta J Canada Bldg				164	Properties
KeyBank Building				755,485	
Salishan 7				15,345	
Trees Properties (Conifer S, Pine Tree, Redwood Juniper)				10,000	Development
James Center				10,886	
Court F (HT 1800 Block)				36	
Developer Fee - General Development Activity				44,039	
Bus Development Activity				1,384	
CS General Business Activities				7,392	Client Support
CSA Program - Business Activities				925	
Department of Commerce Funding for Crisis Residential Center				82,592	
Community Services MTW Fund				4,746	
Education Private Grants (Gates, etc.)				42,517	
AMP 6 - Scattered Sites				5,285	Public Housing
THA SUBTOTAL				1,467,462	
Hillside Terrace 2 & 1500				3,630	Tax Credit Projects - Reimbursable
Bay Terrace I & II & Community Facility				8,715	
Arlington Youth Campus				882	
Court F (The Rise)				2,168	
Renew Tacoma Housing				19,343	
Salishan 1 - Salishan 6				16,574	
TAX CREDIT SUBTOTAL (Operations & Development - billable)				51,314	1,518,776
Section 8 Checking Account (HAP Payments)					
SRO/HCV/VASH/FUP/NED	Check #'s	**484,674** -	**484,865**	158,195	
	ACHs	**9,626** -	**10,546**	3,552,630	$ 3,710,826
Payroll & Payroll Fees - ADP					$ 843,981
TOTAL DISBURSEMENTS					$ 6,073,582

TACOMA HOUSING AUTHORITY
CASH POSITION - July 2021

Account Name			Current Balance	Interest
HERITAGE BANK				
Accounts Payable			7,353,400	0.27%
Section 8 Checking			2,280,059	0.27%
THA Affordable Housing Proceeds-Salishan			1,971,647	0.27%
THA Scattered Sites Proceeds			5,885,733	0.27%
FSS Escrows			220,136	0.27%
CSA Escrows			123,337	0.27%
Note Fund Account			103	0.27%
Key Bank Security Deposits			1,052	0.27%
THA Investment Pool			337	0.27%
THDG - Tacoma Housing Development Group			1,066,732	0.27%
Salishan 7 Operations			1,531,355	0.27%
Salishan 7 Security Deposit			28,948	0.27%
Salishan 7 Replacement Reserve			465,885	0.27%
Salishan 7 Operating Reserve			203,629	0.27%
Highland Crest Operations			1,404,199	0.27%
Highland Crest Replacement Reserve			298,021	0.27%
Highland Crest Security Deposit			38,783	0.27%
Outrigger Operations			580,194	0.27%
Outrigger Replacement Reserve			233,285	0.27%
Outrigger Security Deposit			19,053	0.27%
Prairie Oaks Operations			198,710	0.27%
Prairie Oaks Replacement Reserve			36,470	0.27%
Prairie Oaks Security Deposit			6,372	0.27%
Payroll Account			4,786	0.27%
HOME STREET BANK				
James Center North Operations			936,598	0.00%
James Center North Security Deposit			63,049	0.00%
WASHINGTON STATE				
Investment Pool			$ 1,525,762	0.18%
1. TOTAL THA CASH BALANCE			**$ 26,477,635**	
Less:				
2. Total MTW Cash Balance			**$ -**	
Less Minimum Operating Reserves				
2.01 Public Housing AMP Reserves (4 months Operating Exp.)				
2.02 S8 Admin Reserves (3 months Operating Exp.)			726,000	
2.09 Less Total Minimum Operating Reserves			$ 726,000	
2.1. MTW Cash Available (Lines 2-2.09)			**$ -**	
3. MTW Cash Held By HUD			**$ 9,640,394**	
4. Non MTW Cash Restrictions/Obligations				
4.1 Non MTW Operational Restrictions				
4.10 HUD Restricted - Lot and Property Sales			$ 7,857,379	
4.101 Area 2B Sales Proceeds (Afford Hsg)		1,971,647		
4.102 Scattered Sites Proceeds (Afford Hsg)		5,885,733		
4.20 THA Property Accounts Reserved			$ 2,624,854	
4.201 Security Deposit Accounts		157,258		
4.202 Highland Crest Operations Reserves		320,000		
4.203 Highland Crest Replacement Reserves		298,021		
4.204 James Center North Operations Reserves		230,000		
4.205 James Center North Capital		262,935		

TACOMA HOUSING AUTHORITY				
CASH POSITION - July 2021				
4.206 Outrigger Operations Reserve		150,000		
4.207 Outrigger Replacement Reserves		233,285		
4.208 Prairie Oaks Operations Reserves		77,000		
4.209 Prairie Oaks Replacement Reserves		76,470		
4.210 Salishan 7 Operations Reserves		354,000		
4.211 Salishan 7 Replacement Reserves		465,885		
4.30 Rental Assistance Reserves			$ 1,170,880	
4.301 Mod Rehab Operating Reserves		94,538		
4.302 VASH, FUP, NED, EHV & MAIN HAP Reserves		831,972		
4.303 FSS Escrows		244,370		
4.40 Prepaid Grants			$ 2,757,393	
4.401 TPS Interlocal (CS-2017-011)		238,275		
4.402 UWPC - Strong Families (CS-2018-003)		36,776		
4.403 Balmer Foundation - Education Prog (CS-2020-005)		593,342		
4.404 College Spark (PI-2018-005)		53,464		
4.405 GTCF Grant (PI-2019-005)		255,099		
4.406 Foundation for Tacoma Students (PI-2019-009)		-		
4.407 Gates - THA Education Program (PI-2020-006)		212,203		
4.408 Kresge Foundation - CHAP Program (RA-2019-009)		251,502		
4.409 Ballmer Foundation - COVID Rent Assist (RA-2020-003)		50,000		
4.410 THDG		1,066,732		
4.60 Total - Non MTW Cash Restrictions (4.10+4.20+4.30+4.40+4.50)			$ 14,410,507	
4.70 Agency Contracted or Budgeted Commitments Remaining			$ -	
		-		
		-		
4.99 Total Non MTW Cash Restrictions/Obligations *(Lines 4.60+4.70)*			$ 14,410,507	
5. THA UNENCUMBERED (Non-MTW) CASH (Lines 1-2-4.99)			$ 12,067,128	
6. Development Advances - Project Reimbursement upon closing/draw			$ -	
6.01 Arlington Crisis Residential Center		-		
6.02 Arlington Youth Housing		-		
6.03 Court F LLLP (1800 Block)		-		

TACOMA HOUSING AUTHORITY

NEW BUSINESS

Resolution 1

TACOMA HOUSING AUTHORITY

RESOLUTION 2021-09-22 (1)

Date: September 22, 2021

To: THA Board of Commissioners

From: April Black
Interim Executive Director

Re: Cybersecurity Policy Approval for NIST 800-171 Compliance

---

This resolution would adopt cybersecurity policies to bring the agency into NIST 800-171 compliance as defined by the Gramm-Leach-Bliley Act of 1999 and required by state and federal agencies.

Background

In order to protect the staff and the community we serve, and to be in compliance with state and federal regulations regarding the protection of personally identifiable information (PII) and other confidential data defined as controlled unclassified information (CUI), the agency should adopt policies to bring THA in compliance with NIST 800-171. NIST 800-171 is a security framework which helps organizations manage and reduce the risk of cybersecurity incidents. The framework was created to operationalize the Gramm-Leach-Bliley Act (GLBA) of 1999. Following the NIST framework as guided by these proposed policies and then by appropriate procedures which operationalize the policies will make THA a safer place in which to work and support our community.

Compliance with NIST 800-171 is required by HUD for any agency dealing with CUI and receiving federal aid and/or grants. While NIST 800-171 audits are not currently common amongst housing authority agencies, compliance would be expected in the event of a breach. And, the federal government, as a whole, is beginning to move towards adoption of the Cybersecurity Maturity Model Certification (CMMC) process as is currently used by the military. Adoption of this standard would require certification that the agency has implemented the NIST framework before federal funding is dispersed.

The agency proposes adopting the proposed policies which would bring THA forward towards compliance with NIST 800-171 and would meet the requirements of CMMC.

While compliance is important and required, the adoption of these policies, the development of supporting procedures and deployment of tactical strategies are first and foremost intended to

---

make the agency and community safer. For example, when all the tactical statements the policies direct are fully implemented, the THA will not only be much better prepared to fend off attacks from ransomware, phishing attacks, viruses, and the like, but also be in a far better position to respond to these incidents should they occur.

Recommendation

Authorize THA's Executive Director to adopt these proposed NIST 800-171 compliant policies to align the agency with state and federal regulations and requirements.

TACOMA HOUSING AUTHORITY

RESOLUTION 2021-09-22 (1)
(Cybersecurity Policy Approval for NIST 800-171 Compliance)

A **RESOLUTION** of the Board of Commissioners of the Housing Authority of the City of Tacoma

WHEREAS, THA has a vested interest in providing a secure cyber infrastructure for the community it serves and the employees of the agency, and

WHEREAS, NIST 800-171 is a standard cybersecurity framework with operationalizes the Gramm-Leach-Bliley Act of 1999, and

WHEREAS, state and federal agencies are moving to require NIST 800-171 compliance for agencies like THA as a prerequisite for receiving federal funds and grants, and

WHEREAS, the proposed policies bring THA into policy compliance with NIST 800-171, now, therefore, be it

Resolved by the Board of Commissioners of the Housing Authority of the City of Tacoma, Washington as follows:

THA's Executive Director is authorized to adopt policies to bring the agency into NIST 800-171 cybersecurity policy compliance.

Approved: September 22, 2021

_____
Stanley Rumbaugh, Chair

Tacoma Housing Authority

Executive Director
April Black

Board of Commissioners
Stanley Rumbaugh, Chair | Shennetta Smith, Vice Chair
Dr. Minh-Anh Hodge | Derek Young | Pastor Michael Purter

To: Board of Commissioners
From: April Black
Date: 09/01/2021
Subject: Cybersecurity Policies for NIST 800-171 Compliance

Introduction:

The Tacoma Housing Authority (THA) prides itself on being an innovative, Moving to Work (MTW) service organization whose core mission is central to everything it does. In order to protect the staff and the community we serve, and to be in compliance with state and Federal regulations regarding the protection of personally identifiable information (PII) and other confidential data defined as controlled unclassified information (CUI), the agency has moved to adopt policies to bring THA in compliance with NIST 800-171. NIST 800-171 is a security framework which helps organizations manage and reduce the risk of cybersecurity incidents. The framework was created to operationalize the Gramm-Leach-Bliley Act (GLBA) of 1999. Following the NIST framework as guided by these proposed policies and then by appropriate procedures which operationalize the policies will make THA a safer place in which to work and support our community.

Compliance with NIST 800-171 is required by HUD for any agency dealing with CUI and receiving Federal aid and/or grants. While NIST 800-171 audits are not currently common amongst housing authority agencies, compliance would be expected in the event of a breach. However, the Federal government, as a whole, is beginning to move towards adoption of the Cybersecurity Maturity Model Certification (CMMC) process as is currently used by the military. Adoption of this standard would require certification that the agency has implemented the NIST framework before Federal funding is dispersed.

The proposed policies would bring THA forward towards compliance with NIST 800-171 and would meet the requirements of CMMC.

While compliance is important and required, the adoption of these policies, the development of supporting procedures and deployment of tactical strategies are first and foremost intended to make the community safer. For example, when all the tactical statements the policies direct are fully implemented, the THA will not only be much better prepared to fend off attacks from ransomware, phishing attacks, viruses, and the like, but also be in a far better position to respond to these incidents should they occur.

Details:

The following provides a brief summary of each Information Security Policy (ISP) and identifies other stakeholders in the policy, if applicable. Some policies will only impact IT and its practices and be "behind the scenes". For those that do impact end users, the goal is to implement the framework and policies in a way that is compatible with THA workflows, business functionality and mission. In addition, THA is not doing everything as outlined in the policies today. The goal is to bring THA into full compliance over time. These policies are the first step.

- **ISP 01 – Program Management Policy**. THA will develop and maintain an information security program that includes information security policies and procedures. These policies, procedures, and processes are then used to manage, monitor, and support THA's regulatory, legal, risk, environmental, and operational requirements. These requirements are understood and utilized to inform senior leadership of cybersecurity risk. THA will develop and maintain information security policies that have been approved by senior leadership to provide guidance.

  Additional Stakeholder(s): HR, Risk Manager.

- **ISP 02 – Planning Policy.** THA will create and maintain security and privacy plans to manage its systems and data. In addition, THA will provide its staff rules of online behavior and ask them to acknowledge that they understand. Finally, this policy will state that THA will develop a security and privacy architecture to protect the staff and those they serve and that the THA IT unit will be primarily responsible for the development of these plans and architecture.

  Additional Stakeholder(s): HR.

- **ISP 03 – Risk Assessment Policy.** THA will classify its data by risk. THA will periodically conduct assessments of risk, which will include the likelihood and magnitude of harm from the unauthorized access, use, disclosure, disruption, modification and/or destruction of THA systems, system components, and the information processed, stored, and/or transmitted by the systems. Risk assessment results will be documented and reviewed by the security official or designee. The risk assessment results will then be disseminated to appropriate staff including the THA leadership team. Risk assessments will be conducted annually by THA or whenever there are significant changes to THA, its system, or other conditions that may impact cybersecurity. Finally, THA will monitor and scan its systems for vulnerabilities as part of risk assessment activities.

  Additional Stakeholder(s): Data Standards (PIE), Risk Manager.

- **ISP 04 – Assessment Authorization and Monitoring Policy.** THA will be deliberate in protecting the confidentiality, integrity, and availability of its data and systems and will develop defined plans. THA system, system components, integrations, and assets will be monitored at discrete intervals to identify information security events and to verify the effectiveness of protective measures. THA detection processes and procedures will be maintained to provide for the identification of information security events. Detection processes will be tested and revised to ensure the timely notification of anomalous events to the appropriate responsible parties.

  Additional Stakeholder(s): None.

- **ISP 05 – Supply Chain Management Policy.** THA will be deliberate in its purchasing hardware to ensure that the technology the agency receives has not been compromised, it meets quality/security standards, and that it can get the equipment it needs when it needs it. THA will assess vendors and create contracting standards to ensure THA needs are met. THA will dispose of equipment using secure methods.

  Additional Stakeholder(s): Contracts manager.

- **ISP 06 – System and Service Acquisition Policy.** THA will be deliberate in its purchasing and contracting for software and services. Systems and services will need to be designed and delivered with industry standard security and privacy protections and controls in place. The deployment of systems will be managed with the system lifecycle understood. Vendors will be assessed in how well they meet these requirements.

  Additional Stakeholder(s): Contracts manager.

- **ISP 07 – Identification and Authentication Policy.** THA will limit access to systems, system components, devices, and associated facilities to authorized users, processes, and devices in support of THA's mission and business functions. Multifactor authentication will be deployed for all users. Staff roles and groups will be categorized as to their positional risk with regards to cybersecurity.

  Additional Stakeholder(s): HR.

- **ISP 08 – Access Control Policy.** Access to systems will be actively managed in the use, creation, and deactivation of accounts. Management of accounts will be separated with the creation and deployment managed by different units. Least privilege principles will be applied so staff are given access only to the systems and data they need for their role. Failed attempts to login will be logged. An appropriate use notification will be displayed to users at login. Devices will be locked, and sessions will be terminated after a reasonable defined period of time. Remote access, use of remote devices and WiFi will all actively managed. Information sharing will be controlled.

Additional Stakeholder(s): HR.

- **ISP 09 – Personnel Security Policy.** THA will assign a risk designation to positions and screen employees before hire. THA will remove access to terminated employees and adjust permissions of team members who transfer roles within the organization. There will be access agreements in place for the use of systems. External and/or temporary workers will have security standards they also must meet. Disciplinary procedures will be understood for those who violate these policies. Security and privacy responsibilities, where applicable, will be included in position descriptions.

  Additional Stakeholder(s): HR.

- **ISP 10 – Awareness and Training Policy.** THA staff, and appropriate third-parties will be provided information security awareness training. Appropriate THA staff will be adequately trained to perform their information security-related duties and responsibilities consistent with related policies, procedures, legal requirements, regulations, and agreements. To accomplish this, THA will implement an information security awareness program that discusses common security issues. THA will review the information security awareness program annually and appropriate updates will be applied based on the findings of the annual reviews. THA will require staff to verify annually that they have completed their information security awareness training and are aware of their data security responsibilities and information security policies.

  Additional Stakeholder(s): HR, Risk Manager.

- **ISP 11 – Physical and Environmental Protections Policy.** THA will limit access to specific identified individuals to critical facilities, such as the data center and network closets. Offices will have reasonable controls in place to protect computers while serving guests. Printers will have output controls to prevent unauthorized access and/or use. Access will be monitored. Visitor logs will be kept. Power systems will be protected and include emergency power and lighting capabilities. Emergency shutoff tools for the systems will exist. Fire protection and environmental controls will be functional. Deliveries will be monitored, and unauthorized removal of equipment will be prevented. Remote work sites will be protected. Assets will be tagged, managed, and monitored.

  Additional Stakeholder(s): Facilities.

- **ISP 12 – Maintenance Policy.** THA will perform maintenance on THA systems, system components and any assets providing security functionality to systems and their components. THA acknowledges that proper system maintenance is essential to the performance and availability of THA systems.

  Additional Stakeholder(s): None.

- **ISP 13 – Configuration Management Policy.** THA will develop common standards (baselines) for all deployed systems. It will use change control methodology for the update of these systems, including proactively understanding the security and privacy implications of changes. System changes will be limited to authorized personnel who only have the minimum access they need to accomplish their task. Changes will be documented and a plan to manage changes will be implemented. Systems will be inventoried for their components and software. A data map and architecture will be available where appropriate.

  Additional Stakeholder(s): None.

- **ISP 14 – System and Communications Protections Policy.** THA will separate user functionality from the system management tools. Security infrastructure will prevent the unauthorized transfer of information between systems. THA will take steps to protect systems from denial-of-service actions and ensure necessary resources are available for systems to function properly. THA will secure the boundary between internal and external communications and encrypt data that is transmitted. THA will automatically disconnect network sessions that have been unused for 24 hours. THA will develop and deploy various security standards for remote access and devices. It will use secure standards for network addresses to prevent spoofing. It will have tools that automatically scan for malicious software and actions.

  Additional Stakeholder(s): None.

- **ISP 15 – Media Protection Policy.** THA will protect its digital and non-digital data. Media that contains data will be marked as to whether it is CUI and access will be controlled. If media is transported, it will be secured and protected. If media is disposed of, it will be sanitized. Media will be controlled to prevent its unauthorized removal.

  Additional Stakeholder(s): Facilities.

- **ISP 16 – Data Integrity Policy.** The agency will fix system flaws when they are found and will have tools in place to prevent the injection of malicious code. Systems will be monitored to detect and prevent attacks and otherwise stop unauthorized use of THA systems. The THA will receive and monitor security alerts. Users will be protected from SPAM. System errors will generate useful messages enabling IT staff to correct problems. Data will be maintained according to applicable laws and regulations. Data will be monitored for accuracy and data that is shared will be de-identified as appropriate.

  Additional Stakeholder(s): Data standards (PIE).

- **ISP 17 – Audit and Accountability Policy.** THA systems will log events meaningfully and will be stored for a reasonable amount of time as required by law and regulations. If logging fails, the IT team will be notified. Logs will be regularly reviewed for anomalies and to detect unauthorized use of THA systems. Logs will be in a state that is usable by the IT team. Logs will be protected and secured from tampering or other unauthorized access. Tools will be in place to notify the IT team of significant events.

  Additional Stakeholder(s): None.

- **ISP 18 – Incident Response Policy.** THA will have an Incident Response Plan (IRP) that addresses the processes and procedures to be executed and maintained, to ensure timely response to a detected information security event. Analysis of detected information security events will be conducted to ensure adequate response and to support recovery activities. Upon detection of an information security event, THA will take the necessary actions, including calling on external resources, to prevent the expansion of an event, to mitigate its effects, and eradicate the incident. Upon mitigation of an information security event, THA will incorporate lessons learned into the IRP to improve upon it and report as legally required.

  Additional Stakeholder(s): Risk Manager.

- **ISP 19 – Contingency Planning Policy.** THA will identify critical systems and develop plans to continue its mission in the event of an emergency. The agency will train on these plans in order to execute them effectively and test to ensure the plans are actually effective. It will use cloud services where applicable to provide for business continuity. THA will develop alternative paths for communications as a backup strategy to keep the agency online and functioning. THA will back up its systems where appropriate and will test those backups routinely to ensure they provide the protection intended.

  Additional Stakeholder(s): Risk Manager.

- **ISP 20 – Data Privacy Policy.** THA will alert the public to its privacy policies. It will have processes and procedures in place to ensure the accuracy and integrity of its collected data. THA will reasonably restrict access to private information to the greatest extent possible including for internal use. THA will have mechanisms in place to deal with privacy concerns including contact information on our website. Privacy will be considered in the development of THA systems and people will be asked to consent for the use of their data.

  Additional Stakeholder(s): Communications, HR.
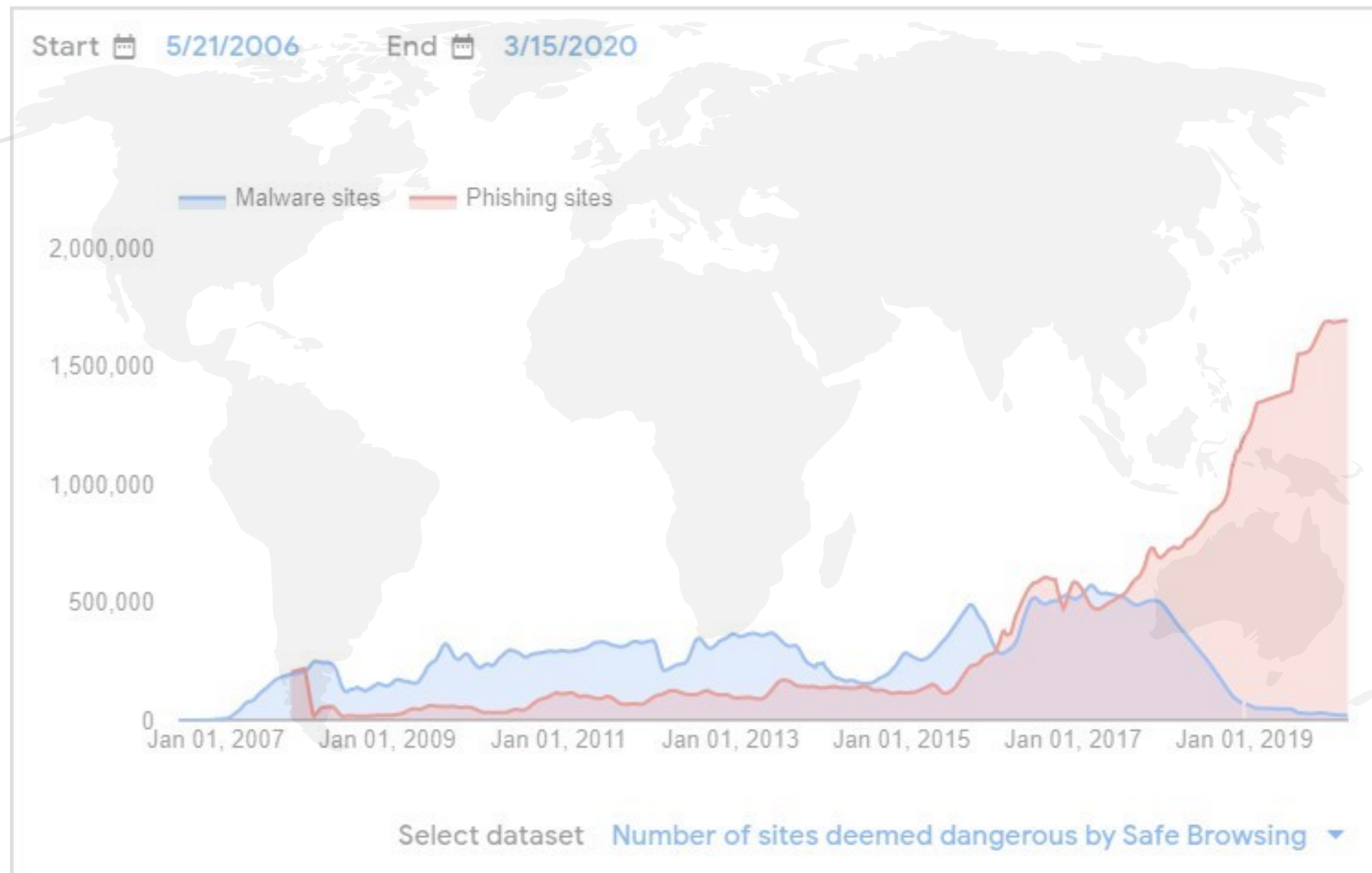
CRITICAL ISSUES IN DATA SECURITY

2019 SECURITY STATISTICS

Start 📅 **5/21/2006**   End 📅 **3/15/2020**

—— Malware sites   —— Phishing sites

2,000,000

1,500,000

1,000,000

500,000

0
Jan 01, 2007   Jan 01, 2009   Jan 01, 2011   Jan 01, 2013   Jan 01, 2015   Jan 01, 2017   Jan 01, 2019

Select dataset   Number of sites deemed dangerous by Safe Browsing ▼

Over **146 billion records** are expected to be exposed through data breaches between 2018 to 2023.

73% of organizations are considered **cyber novices**. Only **11%** are considered **cyber experts**.

61% of data breach victims in 2017 were **businesses with under 1,000 employees**.

The global average cost of a data breach in 2018 is **$3.86 million**. For US companies, it's **$7.91 million**.

88% of companies with over 1 million folders have **over 100,000 folders open for access** for all of their employees.

64% of customers say they're **unlikely to do business** with a company that has experienced a sensitive data breach in the past.

Organizations face an **average cost of $2.8 million** when they lose 1% or less of customers as a result of a breach.

On average, **68% of breaches** took months or longer to discover.

65% of companies have more than 500 users with **passwords that never expire**.

Email is responsible for **92%** of malware infections through **phishing scams**.

Sources: Juniper Research / Hiscox / Verizon / Ponemon / Gemalto / Varonis

INTRODUCTION:

- The core to any modern security program is **NIST 800-171** compliance.

- Fundamentally, NIST 800-171 is a list of **security requirements** which details best security practices in a number of critical IT areas.

- The goal is to protect **Controlled Unclassified Information** (CUI).

- NIST 800-171 operationalizes compliance required under the **Gramm-Leach-Bliley Act** (GLBA) of 1999.

- Most public service organizations are now looking to reach **Cybersecurity Maturity Model Certification** (CMMC) level 3 which is NIST 800-171 plus a few additional requirements.

KEY TAKEAWAYS:

- The department of Housing and Urban Development (HUD) requires GLBA compliance as a prerequisite to receive **Federal Aid**. Compliance is also required for many grants, department of defense programs and is a key component for HIPAA compliance.

- NIST 800-171 compliance provides a best practices security roadmap for public entities.

- The challenge is implementing the framework in a way that is compatible with work flows and the THA mission.

SECURITY PROGRAM OVERVIEW

TIMELINE

STEP1

ACTIVATE GOVERNANCE
Engage with THA governance, including organizational leadership and stakeholder representatives, to gain buy-in with the effort. Changes are very likely. Governance will provide the support needed to move forward.

STEP 2

AUDIT BY QUALIFIED & EXPERIENCED FIRM
Choose a firm that has experience with public entities so they will understand the balance of security and the need to serve our clients. This audit will provide the baseline.

STEP 3

POLICIES

Rework all IT policies to be within the framework of NIST 800-171. NIST 800-171 was not designed for public entities with our service mission, so this will take effort.

STEP 4

PROCEDURES

Rework all the organizations procedures to be in line with the new NIST 800-171 compliant policies.

STEP 5

WORK THROUGH THE FINDINGS AND REPEAT

The audit findings and the effort to remediate these findings are likely to be challenging. The IT team will work need to work through what is found, starting with the higher risks as identified by the auditors. New resources may be needed. Audits will need to be repeated over several years to chart progress.

NIST 800-171	Security Process Area	#
Access Control	Access Management	22
Awareness & Training	Security Program	3
Audit and Accountability	Logging & Monitoring	9
Configuration Management	Asset & Configuration Management	9
Identification & Authentication	Access Management	11
Incident Response	Incident Response	3
Maintenance	Asset & Configuration Management	6
Media Protection	Information Management	9
Personnel Security	Personnel Security	2
Physical Protection	Physical Security	6
Risk Assessment	Risk Management	3
Security Assessment	Risk Management	4
System Communications	Network Security	16
System Integrity	System Security	7

SECURITY PRESSURE POINTS

RANSOMWARE

Malicious software designed to block access to a computer system until a sum of money is paid. Commonly, this software encrypts the user's data and all data the user has privileged access to thus making the data inaccessible until a code is applied.

MALWARE

This software is designed to disrupt, damage and/or gain unauthorized access to a computer system. Often the access is then used to steal information or use the compromised system for other nefarious purposes such as denial of service attacks.

PHISHING

The fraudulent practice of sending emails purposing to be from reputable people or entities in order to induce individuals to reveal personal information, such as passwords and credit card numbers. Spear phishing is highly targeted phishing generally directed at senior leaders.

* COMMUNITY SECURITY TRAINING IS KEY…

A GENERAL NOTE ON SECURITY…

… Give and take

… Cultural change

…Never guaranteed

TACOMA HOUSING AUTHORITY

QUESTIONS?

TACOMA HOUSING AUTHORITY

Policy No.	ISP-01
Policy	Program Management
Date	07/16/2021

1.	Purpose

This policy is intended to contribute information security guidance and assurance. The Program Management Policy serves to detail security program management controls implemented, and planned to be implemented, by Tacoma Housing Authority (THA).

2.	Sources for Policy

- *NIST SP 800-53 r5 – Program Management (PM)*
- *ISO 27001/27002*

3.	Scope of Policy

The Program Management Policy serves as an organization-level policy and may obviate the need for department or system-specific policies. The policy applies to all Tacoma Housing Authority information systems, information system components, facilities, and personnel (including Tacoma Housing Authority executive management).

Tacoma Housing Authority leadership is committed to information security, the Tacoma Housing Authority Information Security Program, and the Information Security Policies. The primary mechanism by which Tacoma Housing Authority leadership demonstrates its commitment is by the approval of the policies.

This policy provides a detailed overview of controls employed by THA. While the controls in this policy apply to the entire organization, the specific control details may not be applicable to all roles within the organization. Whether general or specific knowledge of the controls is required for a job role will be made at the discretion of each department's management.

4.	Who is Responsible for Implementing Policy

Who	Responsibilities
Information Owner	THA Executive Director – The Information Owner is ultimately responsible for the security of Tacoma Housing Authority's information. The Information Owner may delegate risk ownership to specific risk owners as necessary and appropriate.
Information Security Program Sponsor	THA CIO – The Information Security Program Sponsor is responsible for approving the Information Security policies and Information Security Program Plan.
Information Security Officer	THA Senior Director of IT – The Information Security Officer (ISO) is responsible for the coordination,

	development, implementation, and maintenance of the organization-wide information security program.
Information Security Team	THA IT – The Information Security Team supports the ISO in the development, implementation, and maintenance of the information security program.
Tacoma Housing Authority Personnel	THA – All THA personnel are responsible to maintain general awareness of the THA information security policies, and to report suspected security incidents and anamolous activity to the Information Security Team.

5. Approval

6. Change Management

7. Policy

7.1 Tacoma Housing Authority shall protect the confidentiality, integrity, and availability of its data and systems, regardless of how its data is created, distributed, or stored. As such, Tacoma Housing Authority personnel are required to protect and ensure the confidentiality, integrity, and availability of data and systems.

In support of this policy Tacoma Housing Authority maintains information security controls documented in this Policy. This policy details the application of Program Management controls in place, or that are planned to be implemented, in a reasonable and appropriate manner.

7.2 Information Security Program Plan

Policy

1. Develop and disseminate an organization-wide information security program plan that:
    a. Provides an overview of the requirements for the security program and a description of the security program management controls and common controls in place or planned for meeting those requirements.
    b. Includes the identification and assignment of roles, responsibilities, management commitment, coordination among organizational entities, and compliance.
    c. Reflects the coordination among organizational entities responsible for information security.
    d. Is approved by a senior official with responsibility and accountability for the risk being incurred to organizational operations (including mission, functions,

image, and reputation), organizational assets, and personnel.
2. Review and update the organization-wide information security program plan at least annually and following major events necessitating an update.
3. Protect the information security program plan from unauthorized disclosure and/or modification.

7.3 Information Security Program Leadership Role

Policy

1. Appoint a senior Information Security Officer (ISO) with the mission and resources to coordinate, develop, implement, and maintain the organization-wide information security program.
2. Ensure that the ISO, or alternate position title, demonstrates, through previous job title, professional certifications, and education and training, that they have the required knowledge and experience to perform the information security leadership functions required by the ISO position.
3. The ISO develops metrics to assess the effectiveness of security controls.
    a. Develops a control process narrative.
    b. Describes what metrics are captured, and why.
    c. Describes how the metrics are captured.
    d. Describes how the metrics are used for audits and for control effectiveness improvement.

7.4 Policies, Standards, and Procedures

Policy

1. Develop, document, and disseminate to Tacoma Housing Authority personnel:
    a. Organization-level Information Security Policies that:
        i. Are appropriate to Tacoma Housing Authority given its relative size and complexity.
        ii. Addresses purpose, scope, roles, responsibilities, management commitment, coordination among organizational entities, and compliance.
        iii. Includes details of Tacoma Housing Authority's security controls (objectives).
        iv. Includes a commitment to satisfy applicable requirements related to information security.
        v. Includes a commitment to continual improvement of the information security program plan.
    b. Policies are supported by Standards and Procedures, as necessary, to facilitate the implementation of the security controls.
2. The Policies shall be:

       a. Available as documented information.
       b. Available to Tacoma Housing Authority personnel.
       c. Available to interested parties as appropriate.
3. The ISO shall manage the development, documentation, and dissemination of the Policies.
4. The ISO ensures that all governance documents, which include Policies, Standards, and procedures, synchronize with each other, reinforce each other, and reference each other.
       a. Ensures that no governance document is purely standalone, also known as an orphaned document.
5. Departments, Managers, and Team Leads shall manage the development, documentation, and dissemination of any necessary Standards and Procedures.
6. Review and update the Policies, Standards, and Procedures at least annually and following significant events necessitating review and update.

7.5 Information Security and Privacy Resources

Policy
1. Include the resources needed to implement the information security and privacy programs in capital planning and investment requests and document all exceptions to this requirement. 2. Provide sufficient resources, both staff and budget, to implement and manage effectively to ensure that the business processes and control processes associated with information security and data integrity perform in an effective and auditable manner. 3. Prepare documentation required for addressing information security and privacy programs in capital planning and investment requests in accordance with applicable Tacoma Housing Authority policies. 4. Ensures that senior and executive managers are actively involved with, and provide guidance and oversight, into the information security, privacy, compliance, and internal audit programs. 5. Make available for expenditure, the planned information security and privacy resources.

7.6 Plan of Action and Milestones Process

Policy

1. Implement a process to ensure that Plan of Action and Milestones (POAM) for the information security, privacy, supply chain risk management programs, and associated organizational systems:
   a. Are developed and maintained.
   b. Document the remedial risk management actions to adequately respond to risk to Tacoma Housing Authority operations and assets, and personnel.
   c. Are reported in accordance with established reporting requirements.

2. Review the POAM for consistency with Tacoma Housing Authority's risk management strategy and organization-wide priorities for risk response actions.
3. Ensure that all information security planning communications, remediation activities, and validation of the completeness and effectiveness of the remediation activities are documented, and that the documentation is stored and protected in a document repository.

7.7 System Inventory

Policy
1. Develop and update at least annually an inventory of Tacoma Housing Authority systems. 2. The asset inventory includes hardware, software, and interconnected information systems utilized by Tacoma Housing Authority. 3. The asset inventory includes and integrates with the data classification assigned to information systems, as determined by the data managed by those systems. 4. The asset inventory includes a criticality value determined by the business impact analysis (BIA) performed as part of the management of the disaster recovery (DR), business continuity (BC), and incident response (IR) programs. 5. The asset inventory includes a risk value assigned to informational assets, both hardware and software, that is determined by the criticality, sensitivity, and the regulatory status of the informational assets. 6. Data classification is used to determine risk associated with assets. 7. The asset inventory will be integrated with related operational asset management functions such as risk assessments, disaster recovery (DR), business continuity (BC), and incident response (IR).
Enhancements
Inventory of Personal Data Establish, maintain, and update at least annually an inventory of all systems, applications, and projects that process personal data and other regulated data.

7.8 Measures of Performance

Policy
Develop, monitor, and report on the results of information security and privacy measures of performance.

7.9 Critical Infrastructure Plan

Policy

Address information security and privacy issues in the development, documentation, and updating of a critical infrastructure and key resources protection plan.

7.10 Risk Management Strategy

Policy

1. Develop and maintain a comprehensive strategy to manage:
   a. Security risk to Tacoma Housing Authority operations, assets, and personnel associated with the operation and use of Tacoma Housing Authority systems.
   b. Privacy risk to individuals resulting from the authorized processing of personal data.
2. Implement the risk management strategy consistently across Tacoma Housing Authority.
3. Review and update the risk management and risk remediation strategy at least annually or as required to address organizational or regulatory requirement changes.

7.11 Authorization Process

Policy
1. Manage the security and privacy state of Tacoma Housing Authority systems and the environments in which those systems operate through authorization processes. 2. Designate individuals to fulfill specific roles and responsibilities within the Tacoma Housing Authority risk management process. 3. Integrate the authorization processes into the organization-wide risk management program.

7.12 Mission and Business Process Definition

Policy
1. Define Tacoma Housing Authority mission and business processes with consideration for information security and privacy and the resulting risk to Tacoma Housing Authority operations, assets, and personnel. 2. Determine information protection and personal data processing needs arising from the defined mission and business processes. 3. Review and revise the mission and business processes at least annually.

7.13 Insider Threat Program

Policy

Policy
1. Implement an insider threat program that integrates with the Tacoma Housing Authority incident response capability. 2. The Tacoma Housing Authority incident response team includes cross-discipline personnel to accommodate the insider threat program.

7.14 Security and Privacy Workforce

Policy
Establish a security and privacy workforce development and improvement program.

7.15 Testing, Training, and Monitoring

Policy

1. Implement a process for ensuring that Tacoma Housing Authority plans for conducting security and privacy testing, training, and monitoring activities associated with organizational systems:
    a. Are developed and maintained.
    b. Continue to be executed.
2. Review testing, training, and monitoring plans for consistency with the Tacoma Housing Authority risk management strategy and organization-wide priorities for risk response actions.

7.16 Security and Privacy Groups and Associations

Policy
Establish and institutionalize contact with selected groups and associations within the security and privacy communities: 1. To facilitate ongoing security and privacy education and training for Tacoma Housing Authority personnel. 2. To maintain currency with recommended security and privacy practices, techniques, and technologies. 3. To share current security and privacy information, including threats, vulnerabilities, and incidents.

7.17 Protecting Controlled Unclassified Information on External Systems

Policy
1. Establish policies, and procedures as necessary, to ensure that requirements for the

protection of Controlled Unclassified Information (CUI) that is processed, stored or transmitted on external systems, are implemented in accordance with applicable laws, executive orders, directives, policies, regulations, and standards.
2. Review and update the policies and procedures related to CUI at least annually.

7.18 Risk Framing

Policy

1. Identify and document:
    a. Assumptions affecting risk assessments, risk responses, and risk monitoring.
    b. Constraints affecting risk assessments, risk responses, and risk monitoring.
    c. Priorities and trade-offs considered by the organization for managing risk.
    d. Organizational risk tolerance;
2. Distribute the results of risk framing activities to the THA Cabinet at least annually.
3. Review and update risk framing considerations.

7.19 Risk Management Program Leadership Roles

Policy
1. Appoint a Senior Accountable Official for Risk Management to align Tacoma Housing Authority information security and privacy management processes with strategic, operational, and budgetary planning processes. 2. Establish a Risk Manager (function) to view and analyze risk from an organization-wide perspective and ensure management of risk is consistent across the organization.

7.20 Supply Chain Risk Management Strategy

Policy
1. Develop an organization-wide strategy for managing supply chain risks associated with the development, acquisition, maintenance, and disposal of systems, system components, and system services. 2. Implement the supply chain risk management strategy consistently across Tacoma Housing Authority. 3. Review and update the supply chain risk management strategy on at least annually or as required, to address organizational changes.

7.21 Intellectual Property Rights

Policy

Maintain compliance with legislative, regulatory, and contractual requirements related to intellectual property rights and the use of proprietary software products.
Enhancements
Legal Use Document and define the legal use of software and information products. **Software Acquisition** Acquire software only through known and reputable sources to ensure that copyrights are not violated. **Proof of Ownership** Tacoma Housing Authority will maintain proof and evidence of ownership of license, master disks, manuals, ets. **Maximum Number of Users** The maximum number of users within a licence is not to be exceeded. **Reviews** Tacoma Housing Authority conducts reviews at least annually to ensure that only authorized software and licensed products are installed. **Terms and Conditions** Tacoma Housing Authority complies with the terms and conditions for software and information obtained from public networks. **Copyright** 1. Tacoma Housing Authority does not duplicate, convert to another format, or extract from commercial recordings other than permitted by copyrightor other applicable law. 2. Tacoma Housing Authority shall not copy in full or in part, books, articles, reports, or other documents, other than permitted by copyright or other applicable law.

7.22 Protection of Records

Policy
Tacoma Housing Authority records shall be protected from loss, destruction, falsification, unauthorized access, and unauthorized release in accordance with legislative, regulatory, contractual, and business requirements.

7.23 Continuous Monitoring Strategy

Policy

Develop an organization-wide continuous monitoring strategy and implement continuous monitoring programs that include:
1. Establishing organization-wide metrics to be monitored.
2. Establishing frequencies for monitoring and for assessment of control effectiveness.
3. Ongoing monitoring of organizationally defined metrics in accordance with the continuous monitoring strategy.
4. Correlation and analysis of information generated by control assessments and monitoring.
5. Response actions to address results of the analysis of control assessment and monitoring information.
6. Periodically reporting the security and privacy status of organizational systems to the THA Cabinet and Board of Commissioners.

7.24 Purposing

Policy
Analyze Tacoma Housing Authority systems or systems components supporting mission-essential services or functions to ensure that the information resources are being used consistent with their intended purpose.

8. Compliance

This policy is intended to support THA's compliance with the following information security compliance regulations and requirements:
- NIST SP 800-171

TACOMA HOUSING AUTHORITY

Policy No.	ISP-02
Policy	Planning
Date	07/16/2021

1.	Purpose

This policy is intended to contribute information security guidance and assurance. The Planning Policy serves to detail planning controls implemented, and planned to be implemented, by Tacoma Housing Authority (THA).

2.	Sources for Policy

- *NIST SP 800-53 r5 – Planning (PL)*
- *ISO 27001/27002*

3.	Scope of Policy

The Planning Policy serves as an organization-level policy and may obviate the need for department or system-specific policies. The policy applies to all Tacoma Housing Authority information systems, information system components, facilities, and personnel (including Tacoma Housing Authority executive management).

Tacoma Housing Authority leadership is committed to information security, the Tacoma Housing Authority Information Security Program, and the Information Security Policies. The primary mechanism by which Tacoma Housing Authority leadership demonstrates its commitment is by the approval of the policies.

This policy provides a detailed overview of controls employed by THA. While the controls in this policy apply to the entire organization, the specific control details may not be applicable to all roles within the organization. Whether general or specific knowledge of the controls is required for a job role will be made at the discretion of each department's management.

4.	Who is Responsible for Implementing Policy

Who	Responsibilities
Information Owner	THA Executive Director – The Information Owner is ultimately responsible for the security of Tacoma Housing Authority's information. The Information Owner may delegate risk ownership to specific risk owners as necessary and appropriate.
Information Security Program Sponsor	THA CIO – The Information Security Program Sponsor is responsible for approving the Information Security policies and Information Security Program Plan.
Information Security Officer	THA Senior Director of IT – The Information Security Officer (ISO) is responsible for the coordination, development, implementation, and maintenance of the

	organization-wide information security program.
Information Security Team	THA IT – The Information Security Team supports the ISO in the development, implementation, and maintenance of the information security program.
Tacoma Housing Authority Personnel	THA – All THA personnel are responsible to maintain general awareness of the THA information security policies, and to report suspected security incidents and anamolous activity to the Information Security Team.

5.   Approval

6.   Change Management

7.   Policy

7.1 Tacoma Housing Authority shall protect the confidentiality, integrity, and availability of its data and systems, regardless of how its data is created, distributed, or stored. As such, Tacoma Housing Authority personnel are required to protect and ensure the confidentiality, integrity, and availability of data and systems.

In support of this policy Tacoma Housing Authority maintains information security controls documented in the following Policy. These controls detail the application of Planning controls in place, or that are planned to be implemented, in a reasonable and appropriate manner.

7.2 System Security and Privacy Plans

Policy

1. Develop security and privacy plans for the system that:
    a. Are consistent with the organization's enterprise architecture.
    b. Explicitly define the constituent system components.
    c. Describe the operational context of the system in terms of mission and business processes.
    d. Identify the individuals that fulfill system roles and responsibilities.
    e. Identify the information types processed, stored, and transmitted by the system.
    f. Provide the security categorization of the system, including supporting rationale.
    g. Describe any specific threats to the system that are of concern to the organization.
    h. Provide the results of a privacy risk assessment for systems processing

personally identifiable information.

    i. Describe the operational environment for the system and any dependencies on or connections to other systems or system components.

    j. Provide an overview of the security and privacy requirements for the system

    k. Identify any relevant control baselines or overlays,if applicable.

    l. Describe the controls in place or planned for meeting the security and privacy requirements, including a rationale for any tailoring decisions.

    m. Include risk determinations for security privacy architecture and design decisions.

    n. Include security and privacy-related activities affecting the system that require planning and coordination within Tacoma Housing Authority.

    o. Are reviewed and approved by the authorizing official designated representative prior to plan implementation.

2. Distribute copies of the plans and communicate subsequent changes to the plans to appropriate Tacoma Housing Authority personnel and stakeholders.
3. Review the plans at least annually.
4. Update the plans to address changes to the system and environment of operation or problems identified during plan implementation or control assessments.
5. Protect the plans from unauthorized disclosure and modification.

7.3 Rules of Behavior

Policy
1. Establish and provide to individuals requiring access to the system, the rules that describe their responsibilities and expected behavior for information and system usage, security, and privacy.   2. Receive a documented acknowledgment from such individuals, indicating that they have read, understand, and agree to abide by the rules of behavior, before authorizing access to information and the system.   3. Review and update the rules of behavior at least annually.   4. Require individuals who have acknowledged a previous version of the rules of behavior to read and re-acknowledge the rules of behavior at least annually.
Enhancements
Social Media and External Site/Application Usage Restrictions   Include in the rules of behavior, restrictions on: 1. Use of social media, social networking sites, and external sites/applications.   2. Posting organizational information on public websites.   3. Use of organization-provided identifiers (e.g., email addresses) and authentication secrets (e.g., passwords) for creating accounts on external sites/applications.

7.4 Security and Privacy Architectures

Policy

1. Develop security and privacy architectures for the system that:
    a. Describe the requirements and approach to be taken for protecting the confidentiality, integrity, and availability of organizational information.
    b. Describe the requirements and approach to be taken for processing personally identifiable information to minimize privacy risk to individuals.
    c. Describe how the architectures are integrated into and support the enterprise architecture.
    d. Describe any assumptions about, and dependencies on, external systems and services.
2. Ensure information architectures employ segmentation to increase the protection of information confidentiality, integrity, and availability.
3. Review and update the architectures at least annually to reflect changes in the enterprise architecture.
4. Reflect planned architecture changes in security and privacy plans, criticality analysis, organizational procedures, and procurements and acquisitions.

Enhancements
Defense in Depth Design the security and privacy architectures for the system using a defense-in-depth approach that allocates security controls to multiple architectural layers, and ensures that the allocated controls operate in a coordinated and mutually reinforcing manner.

7.5 Central Management

Policy
1. Centrally manage Tacoma Housing Authority controls and related processes.

7.6 Baseline Selection

Policy
1. Select a control baseline for the information security program.

7.7 Baseline Tailoring

Policy
1. Tailor the selected control baseline by applying specified tailoring actions.

8.	Compliance

This policy is intended to support THA's compliance with the following information security compliance regulations and requirements:

- NIST SP 800-171

TACOMA HOUSING AUTHORITY

Policy No.	ISP-03
Policy	Risk Assessment
Date	07/16/2021

1.	Purpose

This policy is intended to contribute information security guidance and assurance. The Risk Assessment Policy serves to detail risk assessment controls implemented, and planned to be implemented, by Tacoma Housing Authority (THA).

2.	Sources for Policy

- *NIST SP 800-53 r5 – Risk Assessment (RA)*
- *ISO 27001/27002*

3.	Scope of Policy

The Risk Assessment Policy serves as an organization-level policy and may obviate the need for department or system-specific policies. The policy applies to all Tacoma Housing Authority information systems, information system components, facilities, and personnel (including Tacoma Housing Authority executive management).

Tacoma Housing Authority leadership is committed to information security, the Tacoma Housing Authority Information Security Program, and the Information Security Policies. The primary mechanism by which Tacoma Housing Authority leadership demonstrates its commitment is by the approval of the policies.

This policy provides a detailed overview of controls employed by THA. While the controls in this policy apply to the entire organization, the specific control details may not be applicable to all roles within the organization. Whether general or specific knowledge of the controls is required for a job role will be made at the discretion of each department's management.

4.	Who is Responsible for Implementing Policy

Who	Responsibilities
Information Owner	THA Executive Director – The Information Owner is ultimately responsible for the security of Tacoma Housing Authority's information. The Information Owner may delegate risk ownership to specific risk owners as necessary and appropriate.
Information Security Program Sponsor	THA CIO – The Information Security Program Sponsor is responsible for approving the Information Security policies and Information Security Program Plan.
Information Security Officer	THA Senior Director of IT – The Information Security Officer (ISO) is responsible for the coordination, development, implementation, and maintenance of the

	organization-wide information security program.
Information Security Team	THA IT – The Information Security Team supports the ISO in the development, implementation, and maintenance of the information security program.
Tacoma Housing Authority Personnel	THA – All THA personnel are responsible to maintain general awareness of the THA information security policies, and to report suspected security incidents and anamolous activity to the Information Security Team.

5. Approval

6. Change Management

7. Policy

7.1 Tacoma Housing Authority shall protect the confidentiality, integrity, and availability of its data and systems, regardless of how its data is created, distributed, or stored. As such, Tacoma Housing Authority personnel are required to protect and ensure the confidentiality, integrity, and availability of data and systems.

In support of this policy Tacoma Housing Authority maintains information security controls documented in the following Policy. These controls detail the application of Risk Assessment controls in place, or that are planned to be implemented, in a reasonable and appropriate manner.

7.2 Data Classification

Policy
1. Information assets are assigned a sensitivity and data classification level based on the appropriate audience for the information. The sensitivity level then guides the selection of protective measures to secure the information. Specific guidance is found in the Tacoma Housing Authority Data Classification Standard.
2. Categorize the systems and the information they processes, stores, and transmits.
3. The categorization is based on, and in alignment with, the Tacoma Housing Authority Data Classification Standard.
4. Document the security categorization results, including supporting rationale, in the security plan for the system.
5. Verify that the authorizing official or authorizing official designated representative reviews and approves the security categorization decision.

7.3 Risk Assessment

Policy

1. Define and document the risk assessment methodology, and map that methodology to supporting external reference frameworks relevant to risk assessment.
2. Conduct a risk assessment, including:
    a. Identifying threats and vulnerabilities.
    b. Determining the likelihood and magnitude of harm from unauthorized access, use, disclosure, disruption, modification, or destruction of information systems, the information Tacoma Housing Authority processes, stores, or transmits, and any related information.
    c. Determining the likelihood and impact of adverse effects on individuals arising from the processing of personal data.
3. Integrate risk assessment results and risk management decisions to include organization-wide and system-level risks.
4. Risk assessments include measures to assess regulatory risk.
5. Document risk assessment results in a risk assessment report.
6. Review risk assessment results at least annually.
7. Disseminate risk assessment results to appropriate Tacoma Housing Authority personnel and stakeholders.
8. Update the risk assessment at least annually or when there are significant changes to the Tacoma Housing Authority operations, systems, or other conditions that may impact security or privacy.

Enhancements

Supply Chain Risk Assessment
    1. Assess supply chain risks associated.
    1. Update the supply chain risk assessment at least annually, when there are significant changes to the relevant supply chain, or when changes to systems, environments of operation, or other conditions may necessitate a change in the supply chain.

7.4 Vulnerability Monitoring and Scanning

Policy

1. Monitor and scan for vulnerabilities in systems and hosted applications at least monthly and when new vulnerabilities potentially affecting the system are identified and reported.
2. Employ vulnerability monitoring tools and techniques that facilitate interoperability among tools and automate parts of the vulnerability management process by using standards for:
    a. Enumerating platforms, software flaws, and improper configurations.
    b. Formatting checklists and test procedures.

	c. Measuring vulnerability impact.
3.	Conduct both internal and external vulnerability scans.
4.	Analyze vulnerability scan reports and results from vulnerability monitoring.
5.	Remediate legitimate vulnerabilities per Tacoma Housing Authority's patch management process and in accordance with the risk assessment.
6.	Share information obtained from the vulnerability monitoring process and control assessments with appropriate Tacoma Housing Authority personnel or roles to help eliminate similar vulnerabilities in other systems.
7.	Employ vulnerability monitoring tools that include the capability to readily update the vulnerabilities to be scanned.

Enhancements
Update Vulnerabilities to be Scanned Update the system vulnerabilities to be scanned prior to a new scan and when new vulnerabilities are identified and reported. **Privileged Access** Implement privileged access authorization to Tacoma Housing Authority system and components for vulnerability scanning activities.

7.5 Technical Surveillance Countermeasures Survey

Policy
1. Employ a technical surveillance countermeasures survey at THA facilities at least semi-annually.

7.6 Risk Response

Policy
1. Respond to findings from security and privacy assessments, monitoring, and audits in accordance with organizational risk tolerance. 2. Methods used to remediate risk are documented and are based on project planning methodology best practices.

7.7 Criticality Analysis

Policy
1. Identify critical system components and functions by performing a criticality analysis at least annually.

8.	Compliance

This policy is intended to support THA's compliance with the following information security compliance regulations and requirements:

- NIST SP 800-171

TACOMA HOUSING AUTHORITY

Policy No.	ISP-04
Policy	Assessment, Authorization, and Monitoring
Date	07/16/2021

1.	Purpose

This policy is intended to contribute information security guidance and assurance. The Assessment, Authorization, and Monitoring Policy serves to detail assessment, authorization, and monitoring controls implemented, and planned to be implemented, by Tacoma Housing Authority (THA).

2.	Sources for Policy

- *NIST SP 800-53 r5 – Assessment, Authorization, and Monitoring (CA)*
- *ISO 27001/27002*

3.	Scope of Policy

The Assessment, Authorization, and Monitoring Policy serves as an organization-level policy and may obviate the need for department or system-specific policies. The policy applies to all Tacoma Housing Authority information systems, information system components, facilities, and personnel (including Tacoma Housing Authority executive management).

Tacoma Housing Authority leadership is committed to information security, the Tacoma Housing Authority Information Security Program, and the Information Security Policies. The primary mechanism by which Tacoma Housing Authority leadership demonstrates its commitment is by the approval of the policies.

This policy provides a detailed overview of controls employed by THA. While the controls in this policy apply to the entire organization, the specific control details may not be applicable to all roles within the organization. Whether general or specific knowledge of the controls is required for a job role will be made at the discretion of each department's management.

4.	Who is Responsible for Implementing Policy

Who	Responsibilities
Information Owner	THA Executive Director – The Information Owner is ultimately responsible for the security of Tacoma Housing Authority's information. The Information Owner may delegate risk ownership to specific risk owners as necessary and appropriate.
Information Security Program Sponsor	THA CIO – The Information Security Program Sponsor is responsible for approving the Information Security policies and Information Security Program Plan.
Information Security	THA Senior Director of IT – The Information Security

Officer	Officer (ISO) is responsible for the coordination, development, implementation, and maintenance of the organization-wide information security program.
Information Security Team	THA IT – The Information Security Team supports the ISO in the development, implementation, and maintenance of the information security program.
Tacoma Housing Authority Personnel	THA – All THA personnel are responsible to maintain general awareness of the THA information security policies, and to report suspected security incidents and anamolous activity to the Information Security Team.

5.   Approval

6.   Change Management

7.   Policy

7.1 Tacoma Housing Authority shall protect the confidentiality, integrity, and availability of its data and systems, regardless of how its data is created, distributed, or stored. As such, Tacoma Housing Authority personnel are required to protect and ensure the confidentiality, integrity, and availability of data and systems.

In support of this policy Tacoma Housing Authority maintains information security controls documented in the following Policy. These controls detail the application of Assessment, Authorization, and Monitoring controls in place, or that are planned to be implemented, in a reasonable and appropriate manner.

7.2 Control Assessments

Policy

1. Select the appropriate assessor or assessment team for the type of assessment to be conducted.
 2. Develop a control assessment plan that describes the scope of the assessment including:
    a. Controls under assessment.
    b. Assessment procedures to be used to determine control effectiveness.
    c. Assessment environment, assessment team, and assessment roles and responsibilities.
 3. Ensure the control assessment plan is reviewed and approved by the authorizing official or designated representative prior to conducting the assessment.
 4. Assess the information security program controls at least annually to determine the

extent to which the controls are implemented correctly, operating as intended, and producing the desired outcome with respect to meeting established security and privacy requirements.
5. Produce a control assessment report that documents the results of the assessment.
6. Provide the results of the control assessment to appropriate Tacoma Housing Authority personnel and stakeholders.

Enhancements

Independent Assessors
Employ independent assessors or assessment teams to conduct control assessments.

Internal Audit
Conduct internal audits at least annually to provide information on whether the information security program:
1. Conforms to applicable compliance requirements as detailed in the information security program plan.
2. Is effectively implemented and maintained.
Tacoma Housing Authority shall:
3. Plan, establish, implement, and maintain an audit program. The audit audit program will include the frequency, methods, responsibilities, planning requirements, and reporting. The audit program will take into consideration the importance of the processes concerned and the results of previous audits.
4. Define the audit criteria and scope for each audit.
5. Select auditors and conduct audits that ensure objectivity and impartiality of the audit process.
6. Ensure that the results of the audits are reported to relevant Tacoma Housing Authority management.
7. Retain documented information as evidence of the audit program and the audit results.

Technical Compliance Reviews
Tacoma Housing Authority information systems are reviewed at least annually for compliance with Tacoma Housing Authority's controls.

7.3 Information Exchange

Policy

1. Approve and manage the exchange of information between internal and external systems using contractual agreements, service level agreements, user agreements, or nondisclosure agreements.
2. Document, as part of each exchange agreement, the interface characteristics, security and privacy requirements, controls, performance and service levels, and responsibilities for each system, and the impact level of the information communicated.
3. Assigns a specific Tacoma Housing Authority owner to each information exchange

channel.
4.

7.4 Plan of Action and Milestones

Policy
1. Develop a Plan of Action and Milestones (POAM) for the information security program to document the planned remediation actions of the organization to correct weaknesses or deficiencies noted during the assessment of the controls and to reduce or eliminate known vulnerabilities in the system.   2. Update existing plan of action and milestones at least annually based on the findings from control assessments, internal and external audits or reviews, risk assessments, and continuous monitoring activities.
Enhancements

Nonconformity and Corrective Action
 When an nonconformity occurs, Tacoma Housing Authority shall:
 1. React to the nonconformity, and as applicable:
     a. Take action to control and correct it.
     b. Deal with the consequences.
 2. Evaluate the need for action to eliminate the cause of the nonconformity, in order that it does not recur or occur elsewhere by:
     a. Reviewing the nonconformity.
     b. Determinant the cause of the nonconformity.
     c. Determining if similar nonconformities exist, or could potentially occur.
 3. Implement any action needed.
 4. Review the effectiveness of any corrective action taken.
 5. Make changes to the information security program, if necessary.
 	
 Corrective actions shall be appropriate to the effects of the nonconformities encountered.
 	
 Tacoma Housing Authority shall retain documented information as evidence of:
 6. The nature of the nonconformities and any subsequent actions taken.
 7. The results of any corrective action.
 	
 Continual Improvement
 Tacoma Housing Authority shall seek to continually improve the suitability, adequacy, and effectiveness of the information security program.

7.5 Authorization

Policy

1. Assign a senior officer as the sponsor for the information security program.
2. Assign a senior officer as the sponsor for common controls available for inheritance by Tacoma Housing Authority systems.
3. Ensure that the authorizing officer for the information security program, before commencing operations:
   a. Accepts the use of common controls inherited by the system.
   b. Authorizes the information security program to operate.
4. Ensure that the authorizing officer for common controls authorizes the use of those controls for inheritance by Tacoma Housing Authority systems.
5. Review and/or update the authorizations at least annually.

7.6 Continuous Monitoring

Policy
Develop system-level continuous monitoring strategies and implement continuous monitoring in accordance with the organization-level continuous monitoring strategy that includes: 1. Establishing system-level metrics to be monitored.   2. Establishing frequencies for monitoring and for assessment of control effectiveness.   3. Ongoing control assessments in accordance with the continuous monitoring strategy.   4. Ongoing monitoring of system and metrics in accordance with the continuous monitoring strategy.   5. Correlation and analysis of information generated by control assessments and monitoring.   6. Response actions to address results of the analysis of control assessment and monitoring information.   7. Reporting the security and privacy status of systems to the ISO, or designee.
Enhancements
Risk Monitoring   Ensure risk monitoring is an integral part of the continuous monitoring strategy that includes the following: 1. Effectiveness monitoring.   2. Compliance monitoring.   3. Change monitoring.

7.7 Penetration Testing

Policy
Conduct penetration testing at least annually on Tacoma Housing Authority systems, or whenever there is a material change to the following Tacoma Housing Authority IT system(s):   1. External network systems.

> 2. Internal network systems.
> 3. Developed applications.

7.8 Internal System Connections

Policy
1. Authorize internal connections between internal systems. 2. Document, for each internal connection, the interface characteristics, security and privacy requirements, and the nature of the information communicated. 3. Terminate internal system connections when they are no longer deemed necessary. 4. Review at least annually the continued need for each internal connection.

8. Compliance

This policy is intended to support THA's compliance with the following information security compliance regulations and requirements:
- NIST SP 800-171

TACOMA HOUSING AUTHORITY

Policy No.	ISP-05
Policy	Supply Chain Management
Date	07/16/2021

1.	Purpose

This policy is intended to contribute information security guidance and assurance. The Supply Chain Management Policy serves to detail supply chaing managment controls implemented, and planned to be implemented, by Tacoma Housing Authority (THA).

2.	Sources for Policy

- *NIST SP 800-53 r5 – Supply Chain Management (SR)*
- *ISO 27001/27002*

3.	Scope of Policy

The Supply Chain Management Policy serves as an organization-level policy and may obviate the need for department or system-specific policies. The policy applies to all Tacoma Housing Authority information systems, information system components, facilities, and personnel (including Tacoma Housing Authority executive management).

Tacoma Housing Authority leadership is committed to information security, the Tacoma Housing Authority Information Security Program, and the Information Security Policies. The primary mechanism by which Tacoma Housing Authority leadership demonstrates its commitment is by the approval of the policies.

This policy provides a detailed overview of controls employed by THA. While the controls in this policy apply to the entire organization, the specific control details may not be applicable to all roles within the organization. Whether general or specific knowledge of the controls is required for a job role will be made at the discretion of each department's management.

4.	Who is Responsible for Implementing Policy

Who	Responsibilities
Information Owner	THA Executive Director – The Information Owner is ultimately responsible for the security of Tacoma Housing Authority's information. The Information Owner may delegate risk ownership to specific risk owners as necessary and appropriate.
Information Security Program Sponsor	THA CIO – The Information Security Program Sponsor is responsible for approving the Information Security policies and Information Security Program Plan.
Information Security Officer	THA Senior Director of IT – The Information Security Officer (ISO) is responsible for the coordination, development, implementation, and maintenance of the

	organization-wide information security program.
Information Security Team	THA IT – The Information Security Team supports the ISO in the development, implementation, and maintenance of the information security program.
Tacoma Housing Authority Personnel	THA – All THA personnel are responsible to maintain general awareness of the THA information security policies, and to report suspected security incidents and anamolous activity to the Information Security Team.

5. Approval

6. Change Management

7. Policy

7.1 Tacoma Housing Authority shall protect the confidentiality, integrity, and availability of its data and systems, regardless of how its data is created, distributed, or stored. As such, Tacoma Housing Authority personnel are required to protect and ensure the confidentiality, integrity, and availability of data and systems.

In support of this policy Tacoma Housing Authority maintains information security controls documented in the following Policy. These controls detail the application of Supply Chain Management controls in place, or that are planned to be implemented, in a reasonable and appropriate manner.

7.2 Supply Chain Risk Management Plan

Policy
1. Develop a plan for managing supply chain risks associated with the research and development, design, manufacturing, acquisition, delivery, integration, operations and maintenance, and disposal of Tacoma Housing Authority information systems, system components or system services.
2. Review and/or update the supply chain risk management plan at least annually or as required, to address threat, organizational or environmental changes.
3. Protect the supply chain risk management plan from unauthorized disclosure and modification.

7.3 Supply Chain Controls and Processes

Policy
1. Establish a process or processes to identify and address weaknesses or deficiencies in the supply chain elements and processes of Tacoma Housing Authority information systems. 2. Employ the following controls to protect against supply chain risks to the Tacoma Housing Authority information systems, system components, or system services and to limit the harm or consequences from supply chain-related events: a. THA Vendor Assessments. 3. Document the selected and implemented supply chain processes and controls in the information security program plan.

7.4 Acquisition Strategies, Tools, and Methods

Policy
1. Employ acquisition strategies, contract tools, and procurement methods to protect against, identify and mitigate supply chain risks.
Enhancements
Assessments Prior to Selection, Acceptance, Modification, or Update Assess the system, system component, or system service prior to selection, acceptance, modification, or update.

7.5 Supplier Assessments and Reviews

Policy
1. Assess and review the supply chain-related risks associated with suppliers or contractors and Tacoma Housing Authority information systems, system components, or system services they provide at least annually.

7.6 Notification Agreements

Policy
1. Establish agreements and procedures with entities involved in the supply chain for Tacoma Housing Authority information systems, system components, or system services for the notification of supply chain compromises.

7.7 Component Authenticity

Policy
1. Develop and implement anti-counterfeit processes that include the means to detect and prevent counterfeit components from entering Tacoma Housing Authority information systems.   2. Report counterfeit system components to the ISO, or designee.

7.8 Component Disposal

Policy
1. Dispose of data, personal data, documentation, tools, and system components using the techniques and methods detailed in the data retention schedule.

8.	Compliance

This policy is intended to support THA's compliance with the following information security compliance regulations and requirements:

- NIST SP 800-171

TACOMA HOUSING AUTHORITY

Policy No.	ISP-06
Policy	Systems and Service Acquisition
Date	07/16/2021

1.	Purpose

This policy is intended to contribute information security guidance and assurance. The Systems and Service Acquisition Policy serves to detail systems and service acquisition controls implemented, and planned to be implemented, by Tacoma Housing Authority (THA).

2.	Sources for Policy

- *NIST SP 800-53 r5 – Systems and Service Acquisition (SA)*
- *ISO 27001/27002*

3.	Scope of Policy

The Systems and Service Acquisition Policy serves as an organization-level policy and may obviate the need for department or system-specific policies. The policy applies to all Tacoma Housing Authority information systems, information system components, facilities, and personnel (including Tacoma Housing Authority executive management).

Tacoma Housing Authority leadership is committed to information security, the Tacoma Housing Authority Information Security Program, and the Information Security Policies. The primary mechanism by which Tacoma Housing Authority leadership demonstrates its commitment is by the approval of the policies.

This policy provides a detailed overview of controls employed by THA. While the controls in this policy apply to the entire organization, the specific control details may not be applicable to all roles within the organization. Whether general or specific knowledge of the controls is required for a job role will be made at the discretion of each department's management.

4.	Who is Responsible for Implementing Policy

Who	Responsibilities
Information Owner	THA Executive Director – The Information Owner is ultimately responsible for the security of Tacoma Housing Authority's information. The Information Owner may delegate risk ownership to specific risk owners as necessary and appropriate.
Information Security Program Sponsor	THA CIO – The Information Security Program Sponsor is responsible for approving the Information Security policies and Information Security Program Plan.
Information Security Officer	THA Senior Director of IT – The Information Security Officer (ISO) is responsible for the coordination,

	development, implementation, and maintenance of the organization-wide information security program.
Information Security Team	THA IT – The Information Security Team supports the ISO in the development, implementation, and maintenance of the information security program.
Tacoma Housing Authority Personnel	THA – All THA personnel are responsible to maintain general awareness of the THA information security policies, and to report suspected security incidents and anamolous activity to the Information Security Team.

5. Approval

6. Change Management

7. Policy

7.1 Tacoma Housing Authority shall protect the confidentiality, integrity, and availability of its data and systems, regardless of how its data is created, distributed, or stored. As such, Tacoma Housing Authority personnel are required to protect and ensure the confidentiality, integrity, and availability of data and systems.

In support of this policy Tacoma Housing Authority maintains information security controls documented in the following Policy. These controls detail the application of Systems and Service Acquisition controls in place, or that are planned to be implemented, in a reasonable and appropriate manner.

7.2 Allocation of Resources

Policy
1. Determine the high-level information security and privacy requirements for Tacoma Housing Authority information systems or system services in mission and business process planning. 2. Determine, document, and allocate the resources required to protect Tacoma Housing Authority systems or system services as part of the organizational capital planning and investment control process. 3. Establish a discrete line item for information security and privacy in Tacoma Housing Authority programming and budgeting documentation.

7.3 System Development Life Cycle

Policy
1. Acquire, develop, and manage Tacoma Housing Authority information systems using Agile system development life cycle that incorporates information security and privacy considerations. 2. Define and document information security and privacy roles and responsibilities throughout the system development life cycle. 3. Identify individuals having information security and privacy roles and responsibilities. 4. Integrate the organizational information security and privacy risk management process into system development life cycle activities.
Enhancements
Manage Preproduction Environment Protect system preproduction environments commensurate with risk throughout the system development life cycle for information systems, system components, or system services. **Technology Refresh** Plan for and implement a technology refresh schedule for Tacoma Housing Authority systems throughout the system development life cycle.

7.4 Acquisition Process

Policy
Include the following requirements, descriptions, and criteria, explicitly or by reference, using standardized contract language in the acquisition contract for Tacoma Housing Authority systems, system components, or system services: 1. Security and privacy functional requirements. 2. Strength of mechanism requirements. 3. Security and privacy assurance requirements. 4. Controls needed to satisfy the security and privacy requirements. 5. Security and privacy documentation requirements. 6. Requirements for protecting the security and privacy documentation. 7. Description of the system development environment and the environment in which the system is intended to operate. 8. Allocation of responsibility or identification of parties responsible for information security, privacy, and supply chain risk management. 9. Acceptance criteria.
Enhancements
Functional Properties of Controls Require the developer of Tacoma Housing Authority systems, system components, or system

services to provide a description of the functional properties of the controls to be implemented.

Design and Implementation Information for Controls
Require the developer of Tacoma Housing Authority systems, system components, or system services to provide design and implementation information for the controls.

Functions, Port, Protocols, and Services in Use
Require the developer of Tacoma Housing Authority systems, system components, or system service to identify the functions, ports, protocols, and services intended for Tacoma Housing Authority use.

Data Ownership
1. Include organizational data ownership requirements in the acquisition contract.
Require all data to be removed from the contractor's systems and returned to Tacoma Housing Authority within 30-days upon termination of agreement.

7.5 System Documentation

Policy

1. Obtain or develop administrator documentation for the Tacoma Housing Authority systems, system components, or system service that describes:
   a. Secure configuration, installation, and operation of the system, component, or service.
   b. Effective use and maintenance of security and privacy functions and mechanisms.
   c. Known vulnerabilities regarding configuration and use of administrative or privileged functions.
2. Obtain or develop user documentation for Tacoma Housing Authority systems, system components, or system service that describes:
   a. User-accessible security and privacy functions and mechanisms and how to effectively use those functions and mechanisms.
   b. Methods for user interaction, which enables individuals to use the system, component, or service in a more secure manner and protect individual privacy.
   c. User responsibilities in maintaining the security of the system, component, or service and privacy of individuals.
3. Document attempts to obtain Tacoma Housing Authority systems, system components, or system service documentation when such documentation is either unavailable or nonexistent.
4. Distribute documentation to appropriate Tacoma Housing Authority personnel.

7.6 Security and Privacy Engineering Principles

Policy

Apply the following systems security and privacy engineering principles in the specification, design, development, implementation, and modification of the system and system components:
1. Clear abstractions
2. Least common mechanism
3. Modularity and layering
4. Partially ordered dependencies
5. Efficiently mediated access
6. Minimized sharing
7. Reduced complexity
8. Secure evolvability
9. Trusted components
10. Hierarchical trust
11. Inverse modification threshold
12. Hierarchical protection
13. Minimized security elements
14. Least privilege
15. Predicate permission
16. Self-reliant trustworthiness
17. Secure distributed composition
18. Trusted communications channels
19. Continuous protection
20. Secure metadata management
21. Self-analysis
22. Accountability and traceability
23. Secure defaults
24. Secure failure and recovery
25. Economic security
26. Performance security
27. Human factored security
28. Acceptable security
29. Repeatable and documented procedures
30. Procedural rigor
31. Secure system modification
32. Sufficient documentation
33. Minimization

7.7 External System Services

Policy
1. Require that providers of external system services comply with Tacoma Housing Authority security and privacy requirements. 2. Define and document organizational oversight and user roles and responsibilities with regard to external system services. 3. Monitor security control compliance by external service providers on an ongoing basis.

Enhancements

Risk Assessments and Organizational Approvals
1. Conduct an assessment of risk prior to the acquisition or outsourcing of information security services; and
2. Verify that the acquisition or outsourcing of dedicated information security services is approved by the ISO.

Identification of Functions, Ports, Protocols, and Services
Require providers of external system services to identify the functions, ports, protocols, and other services required for the use of their services.

7.8 Developer Configuration Management

Policy

Require the developer of Tacoma Housing Authority systems, system components, or system services to:
1. Perform configuration management during system, component, or service implementation.
2. Document, manage and control the integrity of changes to configuration items under configuration management.
3. Implement only organization-approved changes to systems, components, or services.
4. Document approved changes to the system, component, or service and the potential security and privacy impacts of such changes.
5. Track security flaws and flaw resolution within systems, components, or services and report findings to the ISO, or designee.

7.9 Developer Testing and Evaluation

Policy

Require developers of Tacoma Housing Authority systems, system components, or system services at all post-design stages of the system development life cycle to:
1. Identify and document potential risks and vulnerabilities in informational assets to be developed or purchased.
2. Develop and implement a plan for ongoing security and privacy assessments.
3. Perform unit, integration, system, regression testing/evaluation.
4. Produce evidence of the execution of the assessment plan and the results of the testing and evaluation.
5. Implement a verifiable flaw remediation process.
6. Correct flaws identified during testing and evaluation.

Enhancements

Static Code Analysis
Require developers of the Tacoma Housing Authority systems, system components, or system services to employ static code analysis using either tools or manual processes by trained individuals to identify common flaws, and document the results of the analysis.

Threat Modeling and Vulnerability Analyses
Require developers of the Tacoma Housing Authority systems, system components, or system services to perform threat modeling at the pre-design phase, and then at defined checkpoints in the development process which assess how identified threats have been addressed.

Penetration Testing
Require the developer of Tacoma Housing Authority systems, system components, or system services to perform penetration testing.

Dynamic Code Analysis
Require the developer of Tacoma Housing Authority systems, system components, or system services to employ dynamic code analysis using either tools or manual processes by trained individuals to identify common flaws and document the results of the analysis.

Interactive Application Security Testing
Require the developer of Tacoma Housing Authority systems, system components, or system services to employ interactive application security testing tools to identify flaws and document the results.

7.10 Development Process, Standards, and Tools

Policy

1. Require the developer of Tacoma Housing Authority systems, system components, or system services to follow a documented development process that:
    a. Explicitly addresses security and privacy requirements.
    b. Identifies the standards and tools used in the development process.
    c. Documents the specific tool options and tool configurations used in the development process.
    d. Documents, manages, and ensures the integrity of changes to the process and/or tools used in development.
2. Review the development process, standards, tools, tool options, and tool configurations at least annually to determine if the process, standards, tools, tool options and tool configurations selected and employed satisfy Tacoma Housing Authority's security and privacy requirements.

7.11 Developer-Provided Training

Policy

Require the developer of Tacoma Housing Authority systems, system components, or system services to provide training on the correct use and operation of the implemented security and privacy functions, controls, and/or mechanisms.

7.12 Developer Security and Privacy Architecture and Design

Policy
Require developers of Tacoma Housing Authority systems, system components, or system services to produce a design specification and security and privacy architecture that: 1. Is consistent with Tacoma Housing Authority's security and privacy architecture that is an integral part Tacoma Housing Authority's enterprise architecture. 2. Accurately and completely describes the required security and privacy functionality, and the allocation of controls among physical and logical components. 3. Expresses how individual security and privacy functions, mechanisms, and services work together to provide required security and privacy capabilities and a unified approach to protection.

7.13 Developer Screening

Policy
Require that developers of Tacoma Housing Authority systems, system components, or system services pass computer code screening evaluations.

7.14 Unsupported System Components

Policy
Replace system components when support for the components is no longer available from the developer, vendor, or manufacturer.

8. Compliance

This policy is intended to support THA's compliance with the following information security compliance regulations and requirements:
- NIST SP 800-171

TACOMA HOUSING AUTHORITY

Policy No.	ISP-07
Policy	Identification and Authentication
Date	07/16/2021

1.	**Purpose**

This policy is intended to contribute information security guidance and assurance. The Identification and Authentication Policy serves to detail identification and authentication controls implemented, and planned to be implemented, by Tacoma Housing Authority (THA).

2.	**Sources for Policy**

- *NIST SP 800-53 r5 – Identification and Authentication (PM)*
- *ISO 27001/27002*

3.	**Scope of Policy**

The Identification and Authentication Policy serves as an organization-level policy and may obviate the need for department or system-specific policies. The policy applies to all Tacoma Housing Authority information systems, information system components, facilities, and personnel (including Tacoma Housing Authority executive management).

Tacoma Housing Authority leadership is committed to information security, the Tacoma Housing Authority Information Security Program, and the Information Security Policies. The primary mechanism by which Tacoma Housing Authority leadership demonstrates its commitment is by the approval of the policies.

This policy provides a detailed overview of controls employed by THA. While the controls in this policy apply to the entire organization, the specific control details may not be applicable to all roles within the organization. Whether general or specific knowledge of the controls is required for a job role will be made at the discretion of each department's management.

4.	**Who is Responsible for Implementing Policy**

Who	Responsibilities
Information Owner	THA Executive Director – The Information Owner is ultimately responsible for the security of Tacoma Housing Authority's information. The Information Owner may delegate risk ownership to specific risk owners as necessary and appropriate.
Information Security Program Sponsor	THA CIO – The Information Security Program Sponsor is responsible for approving the Information Security policies and Information Security Program Plan.
Information Security Officer	THA Senior Director of IT – The Information Security Officer (ISO) is responsible for the coordination,

	development, implementation, and maintenance of the organization-wide information security program.
Information Security Team	THA IT – The Information Security Team supports the ISO in the development, implementation, and maintenance of the information security program.
Tacoma Housing Authority Personnel	THA – All THA personnel are responsible to maintain general awareness of the THA information security policies, and to report suspected security incidents and anamolous activity to the Information Security Team.

5.	Approval

6.	Change Management

7.	Policy

7.1 Tacoma Housing Authority shall protect the confidentiality, integrity, and availability of its data and systems, regardless of how its data is created, distributed, or stored. As such, Tacoma Housing Authority personnel are required to protect and ensure the confidentiality, integrity, and availability of data and systems.

In support of this policy Tacoma Housing Authority maintains information security controls documented in the following Policy. These controls detail the application of Identification and Authenticationcontrols in place, or that are planned to be implemented, in a reasonable and appropriate manner.

7.2 Identification and Authentication (Internal Users)

Policy
Uniquely identify and authenticate Tacoma Housing Authority internal users and associate that unique identification with processes acting on behalf of those users.
Enhancements
Multi-Factor Authentication to Privileged Accounts Implement multi-factor authentication for access to privileged accounts. **Multi-Factor Authentication to Non-Privileged Accounts** Implement multi-factor authentication for access to non-privileged accounts.

Access to Accounts-Replay Resistant
Implement replay-resistant authentication mechanisms for access to privileged and non-privileged accounts.

Single Sign-On
Provide a single sign-on capability.

7.3 Device Identification and Authentication

Policy
1. Uniquely identify and authenticate devices before establishing a local or remote connections.

7.4 Identifier Management

Policy
Manage system identifiers by: 1. Receiving authorization from THA Human Resources to assign an individual, group, role, service, or device identifier. 2. Selecting an identifier that identifies an individual, group, role, service, or device. 3. Assigning the identifier to the intended individual, group, role, service, or device. 4. Preventing reuse of identifiers for seven (7) years.

7.5 Authenticator Management

Policy
Manage system authenticators by: 1. Verifying, as part of the initial authenticator distribution, the identity of the individual, group, role, service, or device receiving the authenticator. 2. Establishing initial authenticator content for any authenticators issued by the organization. 3. Ensuring that authenticators have sufficient strength of mechanism for their intended use. 4. Establishing and implementing administrative procedures for initial authenticator distribution, for lost or compromised or damaged authenticators, and for revoking authenticators. 5. Changing default authenticators prior to first use. 6. Changing or refreshing authenticators when there is suspicion of compromise. 7. Protecting authenticator content from unauthorized disclosure and modification. 8. Requiring individuals to take, and having devices implement, specific controls to

protect authenticators.
9. Changing authenticators for group or role accounts when membership to those accounts changes.

Enhancements

Password-Based Authentication
For password-based authentication:
1. Maintain a list of commonly-used, expected, or compromised passwords and update the list when organizational passwords are suspected to have been compromised directly or indirectly.
2. Verify, when users create or update passwords, that the passwords are not found on the list of commonly-used, expected, or compromised passwords above.
3. Transmit passwords only over cryptographically-protected channels.
4. Store passwords using an approved salted key derivation function, preferably using a keyed hash.
5. Require immediate selection of a new password upon account recovery.
6. Allow user selection of long (8+ characters) passwords and passphrases, including spaces and all printable characters.
7. Employ automated tools to assist the user in selecting strong password authenticators.
8. Enforce the following composition and complexity rules:
    a. Passwords must be a minimum of eight (8) characters.
    b. Passwords do not expire and require changing after a defined period.
    c. Passwords suspected of compromise must be changed.
    d. There are no complexity requirements to passwords.

Public Key-Based Authentication
1. For public key-based authentication:
    a. Enforce authorized access to the corresponding private key.
    b. Map the authenticated identity to the account of the individual or group; and
2. When public key infrastructure (PKI) is used:
    a. Validate certificates by constructing and verifying a certification path to an accepted trust anchor, including checking certificate status information.
    b. Implement a local cache of revocation data to support path discovery and validation.

Password Managers
1. Employ a password manager to generate and manage passwords where appropriate.

7.6 Authentication Feedback

Policy

1. Obscure feedback of authentication information during the authentication process to protect the information from possible exploitation and use by unauthorized individuals.

7.7 Cryptographic Module Authentication

Policy
1. Implement mechanisms for authentication to a cryptographic module that meet the requirements of applicable laws and regulations for such authentication.

7.8 Identification and Authentication (Non-Organizational Users)

Policy
1. Uniquely identify and authenticate non-organizational users or processes acting on behalf of non-organizational users.

7.9 Service Identification and Authentication

Policy
1. Uniquely identify and authenticate Tacoma Housing Authority information system services and applications before establishing communications with devices, users, or other services or applications.

7.10 Re-authentication

Policy
1. Require users to re-authenticate when authenticators or credentials change.

7.11 Identity Proofing

Policy
1. Identity proof users that require accounts for logical access to systems based on appropriate identity assurance level requirements.   2. Resolve user identities to a unique individual.   3. Collect, validate, and verify identity evidence.

8.	**Compliance**

This policy is intended to support THA's compliance with the following information security compliance regulations and requirements:

- NIST SP 800-171

TACOMA HOUSING AUTHORITY

Policy No.	ISP-08
Policy	Access Control
Date	07/16/2021

1.	Purpose

This policy is intended to contribute information security guidance and assurance. The Access Control Policy serves to detail security access controls implemented, and planned to be implemented, by Tacoma Housing Authority (THA).

2.	Sources for Policy

- *NIST SP 800-53 r5 – Access Control (AC)*
- *ISO 27001/27002*

3.	Scope of Policy

The Access Control Policy serves as an organization-level policy and may obviate the need for department or system-specific policies. The policy applies to all Tacoma Housing Authority information systems, information system components, facilities, and personnel (including Tacoma Housing Authority executive management).

Tacoma Housing Authority leadership is committed to information security, the Tacoma Housing Authority Information Security Program, and the Information Security Policies. The primary mechanism by which Tacoma Housing Authority leadership demonstrates its commitment is by the approval of the policies.

This policy provides a detailed overview of controls employed by THA. While the controls in this policy apply to the entire organization, the specific control details may not be applicable to all roles within the organization. Whether general or specific knowledge of the controls is required for a job role will be made at the discretion of each department's management.

4.	Who is Responsible for Implementing Policy

Who	Responsibilities
Information Owner	THA Executive Director – The Information Owner is ultimately responsible for the security of Tacoma Housing Authority's information. The Information Owner may delegate risk ownership to specific risk owners as necessary and appropriate.
Information Security Program Sponsor	THA CIO – The Information Security Program Sponsor is responsible for approving the Information Security policies and Information Security Program Plan.
Information Security Officer	THA Senior Director of IT – The Information Security Officer (ISO) is responsible for the coordination, development, implementation, and maintenance of the

	organization-wide information security program.
Information Security Team	THA IT – The Information Security Team supports the ISO in the development, implementation, and maintenance of the information security program.
Tacoma Housing Authority Personnel	THA – All THA personnel are responsible to maintain general awareness of the THA information security policies, and to report suspected security incidents and anamolous activity to the Information Security Team.

5.   Approval

6.   Change Management

7.   Policy

7.1 Tacoma Housing Authority (THA) shall protect the confidentiality, integrity, and availability of its data and systems, regardless of how its data is created, distributed, or stored. As such, Tacoma Housing Authority personnel are required to protect and ensure the confidentiality, integrity, and availability of data and systems.

In support of this policy Tacoma Housing Authority maintains information security controls documented in the following Policy. These controls detail the application of Identification and Authenticationcontrols in place, or that are planned to be implemented, in a reasonable and appropriate manner.

7.2 Account Management

Policy

1. Define and document the types of accounts allowed and specifically prohibited for use within THA systems.
2. Assign account managers.
3. Require supervisor authorization for group and role membership.
4. Specify:
    a. Authorized users of each system.
    b. Group and role membership.
    c. Access-level authorizations (i.e., privileges).
5. Require approvals by directors for requests to create accounts.
6. Create, enable, modify, disable, and remove accounts in accordance with THA's Access Control processes.
7. Monitor the use of accounts.

8. Notify account managers within 48-hours:
    a. When accounts are no longer required.
    b. When users are terminated or transferred.
    c. When system usage or need-to-know changes for an individual.
9. Authorize access to the system based on:
    a. A valid access authorization.
    b. Intended system usage.
10. Review accounts for compliance with account management requirements at least annually.
11. Establish and implement a process for changing shared or group account authenticators (if deployed) when individuals are removed from the group.
12. Align account management processes with personnel termination and transfer processes.

Enhancements

Automated System Account Management
Support the management of system accounts.

Disable Accounts
Disable accounts within 48-hours when the accounts:
1. Have expired.
2. Are no longer associated with a user or individual.
3. Are in violation of THA policy.

Automated Audit Actions
Automatically audit account creation, modification, enabling, disabling, and removal actions.

Inactivity Session Lock
Require that users lock their workstation whenever they leave their workstations unattended.

Privileged User Accounts
1. Establish and administer privileged user accounts in accordance with a role-based access scheme.
2. Monitor privileged roles.
3. Monitor changes to roles.
4. Revoke access when privileged roles are no longer appropriate.

Account Monitoring for Atypical Usage
1. Monitor system accounts for atypical usage or anomalous activity, such as accessing systems at certain times of the day or from locations not consistent with normal usage patterns for THA personnel.
2. Monitor the use of system utilities that allow privilege and access escalation.
3. Report atypical usage of system accounts to the ISO, or designee.

| **Disable Accounts for High-Risk Individuals** |
| Disable accounts of individuals within 24 hours of discovery of significant risks. |

7.3 Access Enforcement

Policy
1. Enforce approved authorizations for logical access to information and system resources in accordance with applicable access control policies.
Enhancements
Role-Based Access Control Enforce a role-based access control policy over defined subjects and objects and control access based upon THA roles and users authorized to assume such roles.

7.4 Information Flow Enforcement

Policy
1. Enforce approved authorizations for controlling the flow of information within the system and between connected systems.

7.5 Separation of Duties

Policy
1. Identify and document THA duties of individuals requiring separation. 2. Define system access authorizations to support separation of duties.

7.6 Least Privilege

Policy
1. Employ the principle of least privilege, allowing only authorized accesses for users (or processes acting on behalf of users) that are necessary to accomplish assigned organizational tasks.
Enhancements
Authorize Access to Security Functions Authorize access for THA individuals or roles to: 1. Establish information system accounts.

2. Configure access authorizations.
3. Configure settings for events to be audited.
4. Establish intrusion detection/protection parameters.
5. Establish filtering rules for routers and firewalls.
6. Configure parameters for security services.
7. Manage cryptographic key management information.
8. Access control lists.

Non-Privileged Access for Nonsecurity Functions
Require that users of system accounts (or roles) with access to privileged functions use non-privileged accounts or roles, when accessing nonsecurity functions.

Privileged Accounts
Restrict privileged accounts on the system to authorized THA IT or other authorized personnel.

Review of User Privileges
1. Review at least annually the privileges assigned to THA users to validate the need for such privileges.
2. Reassign or remove privileges, if necessary, to correctly reflect THA business needs.

Log Use of Privileged Functions
Log the execution of privileged functions.

Prevent Non-Privileged Users from Executing Privileged Functions
Prevent non-privileged users from executing privileged functions.

7.7 Unsuccessful Login Attempts

Policy
1. Enforce a limit of four (4) consecutive invalid logon attempts by a user. 2. Automatically lock the account or node for 15 minutes when the maximum number of unsuccessful attempts is exceeded.

7.8 System Use Notification

Policy

1. Display system use notification message or banner to users before granting access to systems that provides privacy and security notices consistent with applicable laws and regulations, and state that:
    a. Users are accessing a THA system.
    b. System usage may be monitored, recorded, and subject to audit.
    c. Unauthorized use of the system is prohibited and subject to criminal and civil penalties.

         d.   Use of the system indicates consent to monitoring and recording.
2. Retain the notification message or banner on the screen until users acknowledge the usage conditions and take explicit actions to log on to or further access the system.
3. For publicly accessible systems:
         a.   Display system use information before granting further access to the publicly accessible system.
         b.   Display references, if any, to monitoring, recording, or auditing that are consistent with privacy accommodations for such systems that generally prohibit those activities.
4. Include a description of the authorized uses of the system.

7.9 Device Lock

Policy
1. Prevent further access to the system by initiating a device lock after 15 minutes of inactivity and requiring the user to initiate a device lock before leaving the system unattended. 2. Retain the device lock until the user reestablishes access using established identification and authentication procedures.
Enhancements
Pattern-Hiding Displays Conceal, via the device lock, information previously visible on the display with a publicly viewable image.

7.10 Session Termination

Policy
1. Automatically terminate a user session after 24-hours of inactivity.

7.11 Permitted Actions without Identification or Authentication

Policy
1. Identify THA user actions that can be performed on the system without identification or authentication consistent with organizational mission and business functions. 2. Document and provide supporting rationale in the security plan for the system, for user actions not requiring identification or authentication.

7.12 Remote Access

Policy

1. Establish and document usage restrictions, configuration/connection requirements, and implementation guidance for allowed remote access.
2. Authorize remote access to the system prior to allowing such connections.
3. Require that remote access employ two-factor (2FA) authentication, especially to THA resources that contain sensitive information assets.
4. Provides guest access for non-authorized individuals, and ensures that guest access has no access to internal company resources.
5. Ensures that any and all remote access connections are:
    a. Fully documented.
    b. Authorized by THA IT.
6. Has a designated owner who is responsible for the secure functioning and review of that connection.

Enhancements
Monitoring and Control Employ automated mechanisms to monitor and control remote access methods. **Protection of Confidentiality and Integrity Using Encryption** Implement cryptographic mechanisms to protect the confidentiality and integrity of remote access sessions. **Managed Access Control Points** Route remote accesses through authorized and managed network access control points. **Privileged Commands and Access** 1. Authorize the execution of privileged commands and access to security-relevant information via remote access only in a format that provides assessable evidence. 2. Document the rationale for remote access in the information security program plan.

7.13 Wireless Access

Policy
1. Establish configuration requirements, connection requirements, and implementation guidance for wireless access. 2. Authorize each type of wireless access prior to allowing such connections.
Enhancements
Authentication and Encryption Protect wireless access using authentication of users and/or devices, and encryption.

7.14 Access Control for Mobile Devices

Policy
1. Establish configuration requirements, connection requirements, and implementation guidance for THA-controlled mobile devices, to include when such devices are outside of controlled areas. 2. Authorize the connection of mobile devices to THA systems.
Enhancements
Full Device or Container-Based Encryption Employ full-device encryption to protect the confidentiality and integrity of information on THA-controlled mobile devices.

7.15 Use of External Systems

Policy

1. Identify controls asserted to be implemented on external systems, consistent with the trust relationships established with other organizations owning, operating, and/or maintaining external systems, allowing authorized individuals to:
   a. Access the system from external systems.
   b. Process, store, or transmit THA-controlled information using external systems.
2. Restrict the use of non-approved file-sharing systems on any and all THA networks and services.

Enhancements
Limits on Authorized Use Permit authorized individuals to use an external system to access the system or to process, store, or transmit THA-controlled information only after: 1. Verification of the implementation of controls on the external system as specified in the THA's security and privacy policies and security and privacy plans. 2. Retention of approved system connection or processing agreements with the organizational entity hosting the external system.

7.16 Information Sharing

Policy
1. Enable authorized users to determine whether access authorizations assigned to a sharing partner match the information's access and use restrictions for information sharing circumstances where user discretion is required. 2. Employ manual processes to assist users in making information sharing and collaboration decisions.

7.17 Publicly Accessible Content

Policy
1. Designate individuals authorized to make information publicly accessible. 2. Train authorized individuals to ensure that publicly accessible information does not contain nonpublic information. 3. Review the proposed content of information prior to posting onto the publicly accessible system to ensure that nonpublic information is not included. 4. Review the content on the publicly accessible system for nonpublic information at least annually and remove such information, if discovered.

8. Compliance

This policy is intended to support THA's compliance with the following information security compliance regulations and requirements:

- NIST SP 800-171

TACOMA HOUSING AUTHORITY

Policy No.	ISP-09
Policy	Personnel Security
Date	07/16/2021

1.	Purpose

This policy is intended to contribute information security guidance and assurance. The Personnel Security Policy serves to detail personnel security controls implemented, and planned to be implemented, by Tacoma Housing Authority (THA).

2.	Sources for Policy

- *NIST SP 800-53 r5 – Personnel Security (PS)*
- *ISO 27001/27002*

3.	Scope of Policy

The Personnel Security Policy serves as an organization-level policy and may obviate the need for department or system-specific policies. The policy applies to all Tacoma Housing Authority information systems, information system components, facilities, and personnel (including Tacoma Housing Authority executive management).

Tacoma Housing Authority leadership is committed to information security, the Tacoma Housing Authority Information Security Program, and the Information Security Policies. The primary mechanism by which Tacoma Housing Authority leadership demonstrates its commitment is by the approval of the policies.

This policy provides a detailed overview of controls employed by THA. While the controls in this policy apply to the entire organization, the specific control details may not be applicable to all roles within the organization. Whether general or specific knowledge of the controls is required for a job role will be made at the discretion of each department's management.

4.	Who is Responsible for Implementing Policy

Who	Responsibilities
Information Owner	THA Executive Director – The Information Owner is ultimately responsible for the security of Tacoma Housing Authority's information. The Information Owner may delegate risk ownership to specific risk owners as necessary and appropriate.
Information Security Program Sponsor	THA CIO – The Information Security Program Sponsor is responsible for approving the Information Security policies and Information Security Program Plan.
Information Security Officer	THA Senior Director of IT – The Information Security Officer (ISO) is responsible for the coordination, development, implementation, and maintenance of the

	organization-wide information security program.
Information Security Team	THA IT – The Information Security Team supports the ISO in the development, implementation, and maintenance of the information security program.
Tacoma Housing Authority Personnel	THA – All THA personnel are responsible to maintain general awareness of the THA information security policies, and to report suspected security incidents and anamolous activity to the Information Security Team.

5.   Approval

6.   Change Management

7.   Policy

7.1 Tacoma Housing Authority shall protect the confidentiality, integrity, and availability of its data and systems, regardless of how its data is created, distributed, or stored. As such, Tacoma Housing Authority personnel are required to protect and ensure the confidentiality, integrity, and availability of data and systems.

In support of this policy Tacoma Housing Authority maintains information security controls documented in the following Policy. These controls detail the application of Identification and Authenticationcontrols in place, or that are planned to be implemented, in a reasonable and appropriate manner.

7.2 Position Risk Designation

Policy
1. Assign a risk designation to all THA positions.   2. Establish screening criteria for individuals filling those positions.   3. Review and update position risk designations at least annually.

7.3 Personnel Screening

Policy
1. Screen individuals prior to authorizing access to THA systems.

7.4 Personnel Termination

Policy
Upon termination of individual employment: 1. Disable system access within 48-hours. 2. Terminate or revoke any authenticators and credentials associated with the individual. 3. Conduct exit interviews that include a discussion of the terminated personnel's continued commitment to THA confidentiality. 4. Retrieve all security-related organizational system-related property. 5. Retain access to THA information and systems formerly controlled by the terminated individual.

7.5 Personnel Transfer

Policy
1. Review and confirm ongoing operational need for current logical and physical access authorizations to systems and facilities when individuals are reassigned or transferred to other positions within THA. 2. Initiate transfer or reassignment actions within 48-hours following the formal transfer action. 3. Modify access authorization as needed to correspond with any changes in operational need due to reassignment or transfer. 4. Notify THA IT within 48-hours.

7.6 Access Agreements

Policy
1. Develop and document access agreements for organizational systems. 2. Review and update the access agreements at least annually. 3. Verify that individuals requiring access to organizational information and systems: a. Sign appropriate access agreements prior to being granted access. 4. Re-sign access agreements to maintain access to THA systems at least annually.

7.7 External Personnel Security

Policy
1. Establish personnel security requirements, including security roles and responsibilities for external providers. 2. Require external providers to comply with personnel security policies and procedures established by THA. 3. Document personnel security requirements. 4. Require external providers to notify THA of any personnel transfers or terminations of external personnel who possess THA credentials and/or badges, or who have system

privileges 48-hours.
5. Monitor provider compliance with personnel security requirements.

7.8 Personnel Sanctions

Policy
1. Employ a formal and documented sanctions process for individuals failing to comply with established information security and privacy policies and procedures. 2. Notify the THA Information Security Team and Human Resources department within 48-hours when a formal employee sanctions process is initiated that relates to a failure to comply with established information security and privacy policies and procedures, identifying the individual sanctioned and the reason for the sanction.

7.9 Position Description

Policy
1. Incorporate security and privacy roles and responsibilities into organizational position descriptions.

8.	Compliance

This policy is intended to support THA's compliance with the following information security compliance regulations and requirements:

- NIST SP 800-171

TACOMA HOUSING AUTHORITY

Policy No.	ISP-10
Policy	Awareness and Training
Date	07/16/2021

1.	Purpose

This policy is intended to contribute information security guidance and assurance. The Awareness and Training Policy serves to detail security awareness and training controls implemented, and planned to be implemented, by Tacoma Housing Authority (THA).

2.	Sources for Policy

- *NIST SP 800-53 r5 – Awareness and Training (PS)*
- *ISO 27001/27002*

3.	Scope of Policy

The Awareness and Training Policy serves as an organization-level policy and may obviate the need for department or system-specific policies. The policy applies to all Tacoma Housing Authority information systems, information system components, facilities, and personnel (including Tacoma Housing Authority executive management).

Tacoma Housing Authority leadership is committed to information security, the Tacoma Housing Authority Information Security Program, and the Information Security Policies. The primary mechanism by which Tacoma Housing Authority leadership demonstrates its commitment is by the approval of the policies.

This policy provides a detailed overview of controls employed by THA. While the controls in this policy apply to the entire organization, the specific control details may not be applicable to all roles within the organization. Whether general or specific knowledge of the controls is required for a job role will be made at the discretion of each department's management.

4.	Who is Responsible for Implementing Policy

Who	Responsibilities
Information Owner	THA Executive Director – The Information Owner is ultimately responsible for the security of Tacoma Housing Authority's information. The Information Owner may delegate risk ownership to specific risk owners as necessary and appropriate.
Information Security Program Sponsor	THA CIO – The Information Security Program Sponsor is responsible for approving the Information Security policies and Information Security Program Plan.
Information Security Officer	THA Senior Director of IT – The Information Security Officer (ISO) is responsible for the coordination, development, implementation, and maintenance of the

	organization-wide information security program.
Information Security Team	THA IT – The Information Security Team supports the ISO in the development, implementation, and maintenance of the information security program.
Tacoma Housing Authority Personnel	THA – All THA personnel are responsible to maintain general awareness of the THA information security policies, and to report suspected security incidents and anamolous activity to the Information Security Team.

5.	Approval

6.	Change Management

7.	Policy

7.1 Tacoma Housing Authority shall protect the confidentiality, integrity, and availability of its data and systems, regardless of how its data is created, distributed, or stored. As such, Tacoma Housing Authority personnel are required to protect and ensure the confidentiality, integrity, and availability of data and systems.

In support of this policy Tacoma Housing Authority maintains information security controls documented in the following Policy. These controls detail the application of Identification and Authenticationcontrols in place, or that are planned to be implemented, in a reasonable and appropriate manner.

7.2 Literacy Training and Awareness

Policy

1. Provide security and privacy literacy training to system users (including managers, senior executives, and contractors):
    a. As part of initial training for new users and at least annually thereafter.
    b. When required by significant information security or data privacy changes.
2. Employ the following techniques to increase the security and privacy awareness of system users:
    a. Security reminders.
3. Update literacy training and awareness content at least annually and following significant information security and data privacy changes.
4. Incorporate lessons learned from internal or external security or privacy incidents into literacy training and awareness techniques.
5. Require recipients of training to formally acknowledge their training.

Enhancements
Insider Threat Provide literacy training on recognizing and reporting potential indicators of insider threat. **Social Engineering and Mining** Provide literacy training on recognizing and reporting potential and actual instances of social engineering and social mining.

7.3 Role-Based Training

Policy

1. Provide role-based security and privacy training to Information Security Team personnel:
    a. Before authorizing access to THA systems, information, or performing assigned duties, and at least annually thereafter.
    b. When required by system changes.
2. Update role-based training content at least annually.
3. Incorporate lessons learned from internal or external security or privacy incidents into role-based training.

Enhancements
Practical Exercises Provide practical exercises in security and privacy training that reinforce training objectives.

7.4 Training Records

Policy
1. Document and monitor information security and privacy training activities, including security and privacy awareness training and specific role-based security and privacy training. 2. Retain training and attendendance records, and associated acknowledgements. 3. Retain individual training records for at least seven years.

8.	**Compliance**

This policy is intended to support THA's compliance with the following information security compliance regulations and requirements:
- NIST SP 800-171

TACOMA HOUSING AUTHORITY

Policy No.	ISP-11
Policy	Physical and Environmental Protections
Date	07/16/2021

1.	Purpose

This policy is intended to contribute information security guidance and assurance. The Physical and Environmental Protections Policy serves to detail security Physical and Environmental Protection controls implemented, and planned to be implemented, by Tacoma Housing Authority (THA).

2.	Sources for Policy

- *NIST SP 800-53 r5 – Physical and Environmental Protections (PS)*
- *ISO 27001/27002*

3.	Scope of Policy

The Physical and Environmental Protections Policy serves as an organization-level policy and may obviate the need for department or system-specific policies. The policy applies to all Tacoma Housing Authority information systems, information system components, facilities, and personnel (including Tacoma Housing Authority executive management).

Tacoma Housing Authority leadership is committed to information security, the Tacoma Housing Authority Information Security Program, and the Information Security Policies. The primary mechanism by which Tacoma Housing Authority leadership demonstrates its commitment is by the approval of the policies.

This policy provides a detailed overview of controls employed by THA. While the controls in this policy apply to the entire organization, the specific control details may not be applicable to all roles within the organization. Whether general or specific knowledge of the controls is required for a job role will be made at the discretion of each department's management.

4.	Who is Responsible for Implementing Policy

Who	Responsibilities
Information Owner	THA Executive Director – The Information Owner is ultimately responsible for the security of Tacoma Housing Authority's information. The Information Owner may delegate risk ownership to specific risk owners as necessary and appropriate.
Information Security Program Sponsor	THA CIO – The Information Security Program Sponsor is responsible for approving the Information Security policies and Information Security Program Plan.
Information Security	THA Senior Director of IT – The Information Security

Officer	Officer (ISO) is responsible for the coordination, development, implementation, and maintenance of the organization-wide information security program.
Information Security Team	THA IT – The Information Security Team supports the ISO in the development, implementation, and maintenance of the information security program.
Tacoma Housing Authority Personnel	THA – All THA personnel are responsible to maintain general awareness of the THA information security policies, and to report suspected security incidents and anamolous activity to the Information Security Team.

5. Approval

6. Change Management

7. Policy

7.1 Tacoma Housing Authority shall protect the confidentiality, integrity, and availability of its data and systems, regardless of how its data is created, distributed, or stored. As such, Tacoma Housing Authority personnel are required to protect and ensure the confidentiality, integrity, and availability of data and systems.

In support of this policy Tacoma Housing Authority maintains information security controls documented in the following Policy. These controls detail the application of Identification and Authenticationcontrols in place, or that are planned to be implemented, in a reasonable and appropriate manner.

7.2 Physical Access Authorizations

Policy
1. Develop, approve, and maintain a list of individuals with authorized access to the THA facilities and facilities where THA information systems reside. 2. Issue authorization credentials for facility access. 3. Review the access list detailing authorized facility access by individuals at least annually. 4. Remove individuals from the facility access list when access is no longer required.

7.3 Physical Access Control

Policy

1. Enforce physical access authorizations at THA facility perimeters and the THA datacenter by:
   a. Verifying individual access authorizations before granting access to facilities.
   b. Controlling ingress and egress using RFID badge system.
2. Maintain physical access audit logs for THA facility perimeters and the THA datacenter.
3. Control access to areas within facilities designated as publicly accessible by implementing the following controls:
   a. Lobby area doors that are unlocked during business hours, and automatically lock during non-business hours.
4. Escort visitors and control visitor activity.
5. Secure keys, combinations, and other physical access devices.
6. Inventory RFID badges at least annually.
7. Change combinations and keys when keys are lost, combinations are compromised.

7.4 Access Control for Transmission

Policy
1. Control physical access to system distribution and transmission lines within THA facilities using: a. RFID badge readers and/or hard lock and key.

7.5 Access Control for Output Devices

Policy
Control physical access to output from devices such as monitors, printers, scanners, audio devices, fax machines, and copiers to prevent unauthorized individuals from obtaining the output.

7.6 Monitoring Physical Access

Policy
1. Monitor physical access to the facilities where information systems reside to detect and respond to physical security incidents. 2. Review physical access logs upon occurrence of events or potential indications of events. 3. Coordinate results of reviews and investigations with the organizational incident response capability.

Enhancements
Intrusion Alarms and Surveillance Equipment Monitor physical access to the facilities using physical intrusion alarms and surveillance equipment.

Video Surveillance
1. Employ video surveillance of THA facility perimeters and the THA datacenter.
2. Review video recordings upon occurrence of events or potential indications of events.
3. Retain video recordings for at least 30-days.

7.7 Visitor Access Records

Policy
1. Maintain visitor access records to the facility where the system resides. 2. Review visitor access records at least annually 3. Report anomalies in visitor access records to the THA Security Team.
Enhancements
Automated Records Maintenance and Review Maintain and review visitor access records using automated mechanisms.

7.8 Power Equipment and Cabling

Policy
1. Protect power equipment and power cabling for information systems from damage and destruction.

7.9 Emergency Shutoff

Policy
1. Provide the capability of shutting off power to the THA datacenter in emergency situations. 2. Place emergency shutoff switches or devices in electrical closet adjacent to the datacenter to facilitate access for authorized personnel. 3. Protect emergency power shutoff capability from unauthorized activation.

7.10 Emergency Power

Policy
1. Provide an uninterruptible power supply to facilitate an orderly shutdown of the system and transition of the system to long-term alternate power in the event of a primary power source loss.

7.11 Emergency Lighting

Policy

Employ and maintain automatic emergency lighting that activates in the event of a power outage or disruption and that covers emergency exits and evacuation routes within THA facilities.

7.12 Fire Protection

Policy
1. Employ and maintain fire detection and suppression systems that are supported by an independent energy source.

7.13 Environmental Controls

Policy
1. Maintain temperature environmental control levels within facilities where information systems reside at. 2. Monitor environmental control levels.

7.14 Water Damage Protection

Policy
1. Protect THA systems from damage resulting from water leakage by providing master shutoff or isolation valves that are accessible, working properly, and known to key personnel.

7.15 Delivery and Removal

Policy
1. Authorize and control system components entering and exiting the facility. 2. Maintain records of the system components.

7.16 Alternate Work Site

Policy

1. Determine and document the THA alternate work sites allowed for use by employees.
2. Employ the following controls at alternate work sites:
    a. Physical access controls.
    b. Visitor access records.
    c. Fire protection.
3. Assess the effectiveness of controls at alternate work sites.
4. Provide a means for employees to communicate with information security and privacy personnel in case of incidents.

7.17 Location of System Components

Policy
1. Position system components within the facility to minimize potential damage from physical and environmental hazards and to minimize the opportunity for unauthorized access.

7.18 Information Leakage

Policy
1. Protect THA information systems from information leakage due to electromagnetic signals emanations.

7.19 Asset Monitoring and Tracking

Policy
1. Employ asset location technologies to track and monitor the location and movement of assets valued at more than $500.

7.20 Electromagnetic Pulse Protection

Policy
1. Employ protective measures against electromagnetic pulse damage.

7.21 Component Marking

Policy
Mark THA system hardware components indicating the impact level or classification level of the information permitted to be processed, stored, or transmitted by the hardware component.

7.22 Facility Location

Policy
1. Plan the location or site of the facility where the system resides considering physical and environmental hazards.
2. For existing facilities, consider the physical and environmental hazards in the organizational risk management strategy.

8. Compliance

This policy is intended to support THA's compliance with the following information security compliance regulations and requirements:

- NIST SP 800-171

TACOMA HOUSING AUTHORITY

Policy No.	ISP-12
Policy	Maintenance
Date	07/16/2021

1.	Purpose

This policy is intended to contribute information security guidance and assurance. The Maintenance Policy serves to detail security Maintenance controls implemented, and planned to be implemented, by Tacoma Housing Authority (THA).

2.	Sources for Policy

- *NIST SP 800-53 r5 – Maintenance (PS)*
- *ISO 27001/27002*

3.	Scope of Policy

The Maintenance Policy serves as an organization-level policy and may obviate the need for department or system-specific policies. The policy applies to all Tacoma Housing Authority information systems, information system components, facilities, and personnel (including Tacoma Housing Authority executive management).

Tacoma Housing Authority leadership is committed to information security, the Tacoma Housing Authority Information Security Program, and the Information Security Policies. The primary mechanism by which Tacoma Housing Authority leadership demonstrates its commitment is by the approval of the policies.

This policy provides a detailed overview of controls employed by THA. While the controls in this policy apply to the entire organization, the specific control details may not be applicable to all roles within the organization. Whether general or specific knowledge of the controls is required for a job role will be made at the discretion of each department's management.

4.	Who is Responsible for Implementing Policy

Who	Responsibilities
Information Owner	THA Executive Director – The Information Owner is ultimately responsible for the security of Tacoma Housing Authority's information. The Information Owner may delegate risk ownership to specific risk owners as necessary and appropriate.
Information Security Program Sponsor	THA CIO – The Information Security Program Sponsor is responsible for approving the Information Security policies and Information Security Program Plan.
Information Security Officer	THA Senior Director of IT – The Information Security Officer (ISO) is responsible for the coordination, development, implementation, and maintenance of the

	organization-wide information security program.
Information Security Team	THA IT – The Information Security Team supports the ISO in the development, implementation, and maintenance of the information security program.
Tacoma Housing Authority Personnel	THA – All THA personnel are responsible to maintain general awareness of the THA information security policies, and to report suspected security incidents and anamolous activity to the Information Security Team.

5.   Approval

6.   Change Management

7.   Policy

7.1 Tacoma Housing Authority shall protect the confidentiality, integrity, and availability of its data and systems, regardless of how its data is created, distributed, or stored. As such, Tacoma Housing Authority personnel are required to protect and ensure the confidentiality, integrity, and availability of data and systems.

In support of this policy Tacoma Housing Authority maintains information security controls documented in the following Policy. These controls detail the application of Identification and Authenticationcontrols in place, or that are planned to be implemented, in a reasonable and appropriate manner.

7.2 Controlled Maintenance

Policy
1. Schedule, document, and review records of maintenance, repair, and replacement on system components in accordance with manufacturer or vendor specifications and/or organizational requirements.
2. Approve and monitor all maintenance activities, whether performed on site or remotely and whether the system or system components are serviced on site or removed to another location.
3. Require that the ISO explicitly approve the removal of the system or system components from THA facilities for off-site maintenance, repair, or replacement.
4. Sanitize equipment to remove the sensitive information from associated media prior to removal from organizational facilities for off-site maintenance, repair, or replacement.
5. Check all potentially impacted controls to verify that the controls are still functioning properly following maintenance, repair, or replacement actions.
6. Maintenance organizational maintenance records.

7.3 Maintenance Tools

Policy
1. Approve, control, and monitor the use of system maintenance tools. 2. Review previously approved system maintenance tools at least annually.

7.4 Nonlocal Maintenance

Policy
1. Approve and monitor nonlocal maintenance and diagnostic activities. 2. Allow the use of nonlocal maintenance and diagnostic tools only as consistent with organizational policy and documented in the security plan for the system, 3. Employ strong authentication in the establishment of nonlocal maintenance and diagnostic sessions. 4. Maintain records for nonlocal maintenance and diagnostic activities. 5. Terminate session and network connections when nonlocal maintenance is completed.

7.5 Maintenance Personnel

Policy
1. Establish a process for maintenance personnel authorization and maintain a list of authorized maintenance organizations or personnel. 2. Verify that non-escorted personnel performing maintenance on the system possess the required access authorizations. 3. Designate organizational personnel with required access authorizations and technical competence to supervise the maintenance activities of personnel who do not possess the required access authorizations.

7.6 Timely Maintenance

Policy
Obtain maintenance support and/or spare parts for THA system components within one (1) day of failure.

8.	Compliance

This policy is intended to support THA's compliance with the following information security compliance regulations and requirements:

- NIST SP 800-171

TACOMA HOUSING AUTHORITY

Policy No.	ISP-13
Policy	Configuration Management
Date	07/16/2021

1.	**Purpose**
	This policy is intended to contribute information security guidance and assurance. The Configuration Management Policy serves to detail security configuration management controls implemented, and planned to be implemented, by Tacoma Housing Authority (THA).
2.	**Sources for Policy**
	• *NIST SP 800-53 r5 – Configuration management (PS)* • *ISO 27001/27002*
3.	**Scope of Policy**
	The Configuration Management Policy serves as an organization-level policy and may obviate the need for department or system-specific policies. The policy applies to all Tacoma Housing Authority information systems, information system components, facilities, and personnel (including Tacoma Housing Authority executive management).
	Tacoma Housing Authority leadership is committed to information security, the Tacoma Housing Authority Information Security Program, and the Information Security Policies. The primary mechanism by which Tacoma Housing Authority leadership demonstrates its commitment is by the approval of the policies.
	This policy provides a detailed overview of controls employed by THA. While the controls in this policy apply to the entire organization, the specific control details may not be applicable to all roles within the organization. Whether general or specific knowledge of the controls is required for a job role will be made at the discretion of each department's management.
4.	**Who is Responsible for Implementing Policy**

Who	Responsibilities
Information Owner	THA Executive Director – The Information Owner is ultimately responsible for the security of Tacoma Housing Authority's information. The Information Owner may delegate risk ownership to specific risk owners as necessary and appropriate.
Information Security Program Sponsor	THA CIO – The Information Security Program Sponsor is responsible for approving the Information Security policies and Information Security Program Plan.
Information Security Officer	THA Senior Director of IT – The Information Security Officer (ISO) is responsible for the coordination,

	development, implementation, and maintenance of the organization-wide information security program.
Information Security Team	THA IT – The Information Security Team supports the ISO in the development, implementation, and maintenance of the information security program.
Tacoma Housing Authority Personnel	THA – All THA personnel are responsible to maintain general awareness of the THA information security policies, and to report suspected security incidents and anamolous activity to the Information Security Team.

5. Approval

6. Change Management

7. Policy

7.1 Tacoma Housing Authority shall protect the confidentiality, integrity, and availability of its data and systems, regardless of how its data is created, distributed, or stored. As such, Tacoma Housing Authority personnel are required to protect and ensure the confidentiality, integrity, and availability of data and systems.

In support of this policy Tacoma Housing Authority maintains information security controls documented in the following Policy. These controls detail the application of Identification and Authenticationcontrols in place, or that are planned to be implemented, in a reasonable and appropriate manner.

7.2 Baseline Configuration

Policy

1. Develop, document, and maintain under configuration control, a current baseline configuration of the system.
 2. Review and update the baseline configuration of the system:
    a. At least monthly.
    b. When required due to urgent necessary updates.
    c. When system components are installed or upgraded.

Enhancements
Automation Support for Accuracy and Currency   Maintain the currency, completeness, accuracy, and availability of the baseline configuration of the system.

Retention of Previous Configurations
Retain previous versions of baseline configurations of the system to support rollback.

Development and Test Environments
Maintain a baseline configuration for system development and test environments that is managed separately from the operational baseline configuration.

7.3 Configuration Change Control

Policy
1. Determine and document the types of changes to the system that are configuration-controlled.

1. Determine and document the types of changes to the system that are configuration-controlled.
2. Review proposed configuration-controlled changes to the system and approve or disapprove such changes with explicit consideration for security and privacy impact analyses.
3. Document configuration change decisions associated with the system.
4. Implement approved configuration-controlled changes to the system.
5. Retain records of configuration-controlled changes to the system.
6. Monitor and review activities associated with configuration-controlled changes to the system.
7. Coordinate and provide oversight for configuration change control activities.

Enhancements

Automated Documentation, Notification, and Prohibition of Changes
Use automated mechanisms to:
1. Document proposed changes to THA systems.
2. Notify the ISO of proposed changes to THA systems and request change approval.
3. Highlight proposed changes to THA systems that have not been approved or disapproved within two (2) weeks.
4. Prohibit changes to THA systems until designated approvals are received.
5. Document all changes to THA systems.
6. Notify the ISO when approved changes to THA systems are completed.

Testing, Validation, and Documentation of Changes
Test, validate, and document changes to the system before finalizing the implementation of the changes.

Automated Security Response
Implement the following security responses automatically if baseline configurations are changed in an unauthorized manner:
1. Alert the THA incident response team.

7.4 Impact Analyses

Policy
Analyze changes to THA systems to determine potential security and privacy impacts prior to change implementation.

Enhancements
Separate Test Environments Analyze changes to THA systems in a separate test environment(s) before implementation in an operational environment, looking for security and privacy impacts due to flaws, weaknesses, incompatibility, or intentional malice. **Verification of Controls** After system changes, verify that the impacted controls are implemented correctly, operating as intended, and producing the desired outcome with regard to meeting the security and privacy requirements for THA systems.

7.5 Access Restriction for Change

Policy
1. Define, document, approve, and enforce physical and logical access restrictions associated with changes to the system.

7.6 Configuration Settings

Policy
1. Establish and document configuration settings for components employed within THA systems that reflect the most restrictive mode consistent with operational requirements using THA-defined common secure configurations. 2. Implement the configuration settings. 3. Identify, document, and approve any deviations from established configuration settings. 4. Monitor and control changes to the configuration settings in accordance with organizational policies and procedures.

7.7 Least Functionality

Policy
1. Configure THA systems to provide only mission essential capabilities. 2. Prohibit or restrict the use of the unecessary functions, ports, protocols, software, and/or services.

Enhancements
Periodic Review

1. Review THA systems at least annually to identify unnecessary and/or nonsecure functions, ports, protocols, software, and services.
2. Disable or remove functions, ports, protocols, software, and services within THA systems deemed to be unnecessary and/or nonsecure.

Prevent Program Execution
Prevent program execution in accordance with THA-defined policies, rules of behavior, and/or access agreements regarding software program usage and restrictions.

7.8 System Component Inventory

Policy

1. Develop and document an inventory of system components that:
    a. Accurately reflects the system.
    b. Includes all components within THA systems.
    c. Does not include duplicate accounting of components or components assigned to other systems.
    d. Is at the level of granularity deemed necessary for tracking and reporting.
2. Review and update the system component inventory at least annually.

Enhancements
Updates During Installation and Removal Update the inventory of system components as part of component installations, removals, and system updates.

7.9 Configuration Management Plan

Policy
Develop, document, and implement a configuration management plan for the system that: 1. Addresses roles, responsibilities, and configuration management processes and procedures. 2. Establishes a process for identifying configuration items throughout the system development life cycle and for managing the configuration of the configuration items. 3. Defines the configuration items for THA systems and places the configuration items under configuration management. 4. Is reviewed and approved by the ISO. 5. Protects the configuration management plan from unauthorized disclosure and modification.

7.10 Software Usage Restriction

Policy
1. Use software and associated documentation in accordance with contract agreements

and copyright laws.
2. Track the use of software and associated documentation protected by quantity licenses to control copying and distribution.
3. Control and document the use of peer-to-peer file sharing technology to ensure that this capability is not used for the unauthorized distribution, display, performance, or reproduction of copyrighted work.

7.11 User-Installed Software

Policy
1. Restrict the installation of software by THA users. 2. Enforce software installation processes through the following methods: a. Users are not local device admins. 3. Monitor compliance with user-installed software restrictions.
Enhancements
Software Installation with Privileged Status Allow user installation of software only with explicit privileged status.

7.12 Data Architecture Mapping

Policy
1. Develop and document a map of system data actions.

8.	Compliance

This policy is intended to support THA's compliance with the following information security compliance regulations and requirements:
- NIST SP 800-171

TACOMA HOUSING AUTHORITY

Policy No.	ISP-14
Policy	System and Communications Protections
Date	07/16/2021

1.	Purpose

This policy is intended to contribute information security guidance and assurance. The System and Communications Protections Policy serves to detail System and Communications Protections security controls implemented, and planned to be implemented, by Tacoma Housing Authority (THA).

2.	Sources for Policy

- *NIST SP 800-53 r5 – System and Communications Protections (SC)*
- *ISO 27001/27002*

3.	Scope of Policy

The System and Communications Protections Policy serves as an organization-level policy and may obviate the need for department or system-specific policies. The policy applies to all Tacoma Housing Authority information systems, information system components, facilities, and personnel (including Tacoma Housing Authority executive management).

Tacoma Housing Authority leadership is committed to information security, the Tacoma Housing Authority Information Security Program, and the Information Security Policies. The primary mechanism by which Tacoma Housing Authority leadership demonstrates its commitment is by the approval of the policies.

This policy provides a detailed overview of controls employed by THA. While the controls in this policy apply to the entire organization, the specific control details may not be applicable to all roles within the organization. Whether general or specific knowledge of the controls is required for a job role will be made at the discretion of each department's management.

4.	Who is Responsible for Implementing Policy

Who	Responsibilities
Information Owner	THA Executive Director – The Information Owner is ultimately responsible for the security of Tacoma Housing Authority's information. The Information Owner may delegate risk ownership to specific risk owners as necessary and appropriate.
Information Security Program Sponsor	THA CIO – The Information Security Program Sponsor is responsible for approving the Information Security policies and Information Security Program Plan.
Information Security	THA Senior Director of IT – The Information Security

Officer	Officer (ISO) is responsible for the coordination, development, implementation, and maintenance of the organization-wide information security program.
Information Security Team	THA IT – The Information Security Team supports the ISO in the development, implementation, and maintenance of the information security program.
Tacoma Housing Authority Personnel	THA – All THA personnel are responsible to maintain general awareness of the THA information security policies, and to report suspected security incidents and anamolous activity to the Information Security Team.

5.   Approval

6.   Change Management

7.   Policy

7.1 Tacoma Housing Authority shall protect the confidentiality, integrity, and availability of its data and systems, regardless of how its data is created, distributed, or stored. As such, Tacoma Housing Authority personnel are required to protect and ensure the confidentiality, integrity, and availability of data and systems.

In support of this policy Tacoma Housing Authority maintains information security controls documented in the following Policy. These controls detail the application of Identification and Authenticationcontrols in place, or that are planned to be implemented, in a reasonable and appropriate manner.

7.2 Separation of System and User Functionality

Policy
Separate user functionality, including user interface services, from system management functionality.

7.3 Information in Shared System Resources

Policy
Prevent unauthorized and unintended information transfer via shared system resources.

7.4 Denial-of-Service Protection

Policy

1. Limit the effects of of denial-of-service events.
2. Employ controls to achieve the denial-of-service objective.

Enhancements

Capacity, Bandwidth, and Redundancy
Manage capacity, bandwidth, or other redundancy to limit the effects of information flooding denial-of-service attacks.

7.5 Resource Availability

Policy

Protect the availability of resources by allocating resources by priority.

7.6 Boundary Protection

Policy

1. Monitor and control communications at the external managed interfaces to the system and at key internal managed interfaces within the system.
2. Implement subnetworks for publicly accessible system components that are physically and logically separated from internal organizational networks.
3. Connect to external networks or systems only through managed interfaces consisting of boundary protection devices arranged in accordance with an organizational security and privacy architecture.

Enhancements

Access Points
Limit the number of external network connections to the system.
Deny by Default - Allow by Exception
Deny network communications traffic by default and allow network communications traffic by exception at managed interfaces.
Split Tunneling for Remote Devices
Prevent split tunneling for remote devices connecting to organizational systems unless the split tunnel is securely provisioned.
Route Traffic to Authenticated Proxy Servers
Route internal communications traffic to THA-defined external networks through authenticated proxy servers at managed interfaces.
Restrict Threatening Outgoing Communications Traffic
1. Detect and deny outgoing communications traffic posing a threat to external systems.
2. Audit the identity of internal users associated with denied communications.

Prevent Exfiltration
1. Prevent the exfiltration of information.
2. Conduct exfiltration tests at least annually.

Fail Secure
Prevent systems from entering insecure states in the event of an operational failure of a boundary protection device.

7.7 Transmission Confidentiality and Integrity

Policy
Protect the confidentiality of transmitted information.

Enhancements
Cryptographic Protection Implement cryptographic mechanisms to prevent unauthorized disclosure of information during transmission.

7.8 Network Disconnect

Policy
Terminate the network connection associated with a communications session at the end of the session or after 24-hours of inactivity.

7.9 Cryptographic Key Establishment and Management

Policy
Establish and manage cryptographic keys when cryptography is employed within the system.

Enhancements
Availability Maintain availability of information in the event of the loss of cryptographic keys by users.

7.10 Cryptographic Protection

Policy
1. Determine the THA-defined cryptographic uses. 2. Implement the FIPS approved types of cryptography required for each specified cryptographic use.

Enhancements

Regulation of Cryptographic Controls
Cryptographic controls shall be used in compliance with all relevant agreements, legislation, and regulations, and shall include:
    1. Restrictions on import or export of computer hardware and software for performing cryptographic functions.
    2. Restrictions on import or export of computer hardware and software which is designed to have cryptographic functions added to it.
    3. Restrictions on the usage of encryptions.
    4. Mandatory or discretionary methods of access by countries' authorities to information encrypted by hardware or software to provide confidentiality of content.

7.11 Collaborative Computing Devices and Applications

Policy
1. Prohibit remote activation of collaborative computing devices and applications. 2. Provide an explicit indication of use to users physically present at the devices.

7.12 Public Key Infrastructure Certificates

Policy
1. Obtain public key certificates from an approved service provider. 2. Include only approved trust anchors in trust stores or certificate stores managed by the organization.

7.13 Mobile Code

Policy
1. Define acceptable and unacceptable mobile code and mobile code technologies (i.e. Java applets, JavaScript, HTML5, WebGL, and VBScript). 2. Authorize, monitor, and control the use of mobile code within THA systems.

7.14 Secure Name/Address Resolution Service (Authoritative Source)

Policy
1. Provide additional data origin authentication and integrity verification artifacts along with the authoritative name resolution data the system returns in response to external name/address resolution queries. 2. Provide the means to indicate the security status of child zones and (if the child supports secure resolution services) to enable verification of a chain of trust among parent and child domains, when operating as part of a distributed, hierarchical

namespace.

7.15 Secure Name/Address Resolution Service (Recursive or Caching Resolver)

Policy
Request and perform data origin authentication and data integrity verification on the name/address resolution responses the system receives from authoritative sources.

7.16 Architecture and Provisioning for Name/Address Resolution Service

Policy
Ensure THA systems that collectively provide name/address resolution service are fault-tolerant and implement internal and external role separation.

7.17 Session Authenticity

Policy
Protect the authenticity of communications sessions.

7.18 Decoys

Policy
Include components within THA systems specifically designed to be the target of malicious attacks for detecting, deflecting, and analyzing such attacks.

7.19 Protection of Information at Rest

Policy
1. Protect the confidentiality and integrity of the following information at rest.

Enhancements
Cryptographic Protection Implement cryptographic mechanisms to prevent unauthorized disclosure and modification of information protected at rest on THA systems: 1.

7.20 External Malicious Code Identification

Policy
Include system components that proactively seek to identify network-based malicious

code or malicious websites.

7.21 Process Isolation

Policy
Maintain a separate execution domain for each executing system process.

7.22 Time Synchronization

Policy
Synchronize system clocks within and between systems and system components.

8.	**Compliance**

This policy is intended to support THA's compliance with the following information security compliance regulations and requirements:

- NIST SP 800-171

TACOMA HOUSING AUTHORITY

Policy No.	ISP-15
Policy	Media Protection
Date	07/16/2021

1.	Purpose

This policy is intended to contribute information security guidance and assurance. The Media Protection Policy serves to detail media protection controls implemented, and planned to be implemented, by Tacoma Housing Authority (THA).

2.	Sources for Policy

- *NIST SP 800-53 r5 – Media Protection (MP)*
- *ISO 27001/27002*

3.	Scope of Policy

The Media Protection Policy serves as an organization-level policy and may obviate the need for department or system-specific policies. The policy applies to all Tacoma Housing Authority information systems, information system components, facilities, and personnel (including Tacoma Housing Authority executive management).

Tacoma Housing Authority leadership is committed to information security, the Tacoma Housing Authority Information Security Program, and the Information Security Policies. The primary mechanism by which Tacoma Housing Authority leadership demonstrates its commitment is by the approval of the policies.

This policy provides a detailed overview of controls employed by THA. While the controls in this policy apply to the entire organization, the specific control details may not be applicable to all roles within the organization. Whether general or specific knowledge of the controls is required for a job role will be made at the discretion of each department's management.

4.	Who is Responsible for Implementing Policy

Who	Responsibilities
Information Owner	THA Executive Director – The Information Owner is ultimately responsible for the security of Tacoma Housing Authority's information. The Information Owner may delegate risk ownership to specific risk owners as necessary and appropriate.
Information Security Program Sponsor	THA CIO – The Information Security Program Sponsor is responsible for approving the Information Security policies and Information Security Program Plan.
Information Security Officer	THA Senior Director of IT – The Information Security Officer (ISO) is responsible for the coordination, development, implementation, and maintenance of the

	organization-wide information security program.
Information Security Team	THA IT – The Information Security Team supports the ISO in the development, implementation, and maintenance of the information security program.
Tacoma Housing Authority Personnel	THA – All THA personnel are responsible to maintain general awareness of the THA information security policies, and to report suspected security incidents and anamolous activity to the Information Security Team.

5.   Approval

6.   Change Management

7.   Policy

7.1 Tacoma Housing Authority shall protect the confidentiality, integrity, and availability of its data and systems, regardless of how its data is created, distributed, or stored. As such, Tacoma Housing Authority personnel are required to protect and ensure the confidentiality, integrity, and availability of data and systems.

In support of this policy Tacoma Housing Authority maintains information security controls documented in the following Policy. These controls detail the application of Identification and Authenticationcontrols in place, or that are planned to be implemented, in a reasonable and appropriate manner.

7.2 Media Access

Policy
Restrict access to THA digital and/or non-digital data.

7.3 Media Marking

Policy
1. Mark system media indicating the distribution limitations, handling caveats, and applicable security markings (if any) of the information.   2. Exempt non-CUI media from marking if the media remain within THA controlled areas.

7.4 Media Storage

Policy
1. Physically control and securely store digital and/or non-digital media within THA controlled areas.   2. Protect system media until the media are destroyed or sanitized using approved equipment, techniques, and procedures.

7.5 Media Transport

Policy
1. Protect and control system media during transport outside of controlled areas.   2. Maintain accountability for system media during transport outside of controlled areas.   3. Document activities associated with the transport of system media.   4. Restrict the activities associated with the transport of system media to authorized personnel.

7.6 Media Sanitization

Policy
1. Sanitize system media prior to disposal, release out of organizational control, or release for reuse using.   2. Employ sanitization mechanisms with the strength and integrity commensurate with the security category or classification of the information, as per the THA data destruction standard.

Enhancements
Review, Approve, Track, Document, and Verify   Review, approve, track, document, and verify media sanitization and disposal actions.

7.7 Media Use

Policy
1. Restrict the use of removable media on THA systems or system components.   2. Prohibit the use of portable storage devices in THA systems when such devices have no identifiable owner.

8.	**Compliance**

This policy is intended to support THA's compliance with the following information security compliance regulations and requirements:

- NIST SP 800-171

TACOMA HOUSING AUTHORITY

Policy No.	ISP-16
Policy	Data Integrity
Date	07/16/2021

1.	Purpose

This policy is intended to contribute information security guidance and assurance. The Data Integrity Policy serves to detail data integrity controls implemented, and planned to be implemented, by Tacoma Housing Authority (THA).

2.	Sources for Policy

- *NIST SP 800-53 r5 – System and Information Integrity (SI)*
- *ISO 27001/27002*

3.	Scope of Policy

The Data Integrity Policy serves as an organization-level policy and may obviate the need for department or system-specific policies. The policy applies to all Tacoma Housing Authority information systems, information system components, facilities, and personnel (including Tacoma Housing Authority executive management).

Tacoma Housing Authority leadership is committed to information security, the Tacoma Housing Authority Information Security Program, and the Information Security Policies. The primary mechanism by which Tacoma Housing Authority leadership demonstrates its commitment is by the approval of the policies.

This policy provides a detailed overview of controls employed by THA. While the controls in this policy apply to the entire organization, the specific control details may not be applicable to all roles within the organization. Whether general or specific knowledge of the controls is required for a job role will be made at the discretion of each department's management.

4.	Who is Responsible for Implementing Policy

Who	Responsibilities
Information Owner	THA Executive Director – The Information Owner is ultimately responsible for the security of Tacoma Housing Authority's information. The Information Owner may delegate risk ownership to specific risk owners as necessary and appropriate.
Information Security Program Sponsor	THA CIO – The Information Security Program Sponsor is responsible for approving the Information Security policies and Information Security Program Plan.
Information Security Officer	THA Senior Director of IT – The Information Security Officer (ISO) is responsible for the coordination, development, implementation, and maintenance of the

	organization-wide information security program.
Information Security Team	THA IT – The Information Security Team supports the ISO in the development, implementation, and maintenance of the information security program.
Tacoma Housing Authority Personnel	THA – All THA personnel are responsible to maintain general awareness of the THA information security policies, and to report suspected security incidents and anamolous activity to the Information Security Team.

5. Approval

6. Change Management

7. Policy

7.1 Tacoma Housing Authority shall protect the confidentiality, integrity, and availability of its data and systems, regardless of how its data is created, distributed, or stored. As such, Tacoma Housing Authority personnel are required to protect and ensure the confidentiality, integrity, and availability of data and systems.

In support of this policy Tacoma Housing Authority maintains information security controls documented in the following Policy. These controls detail the application of Identification and Authenticationcontrols in place, or that are planned to be implemented, in a reasonable and appropriate manner.

7.2 Flaw Remediation

Policy
1. Identify, report, and correct system flaws.   2. Test software and firmware updates related to flaw remediation for effectiveness and potential side effects before installation.   3. Install security-relevant software and firmware updates within at least one (1) month of the release of the updates.   4. Incorporate flaw remediation into the organizational configuration management process.

7.3 Malicious Code Protection

Policy
1. Implement signature based malicious code protection mechanisms at system entry and

exit points to detect and eradicate malicious code.
2. Automatically update malicious code protection mechanisms as new releases are available in accordance with THA configuration management policy and procedures.
3. Configure malicious code protection mechanisms to:
   a. Perform periodic scans of the system at least daily and real-time scans of files from external sources at network entry and exit points as the files are downloaded, opened, or executed in accordance with organizational policy.
   b. Block, quarantine, and eradicate malicious code and send alerts to THA IT in response to malicious code detection.
4. Address the receipt of false positives during malicious code detection and eradication and the resulting potential impact on the availability of the system.

7.4 System Monitoring

Policy

1. Monitor the system to detect:
    a. Attacks and indicators of potential attacks.
    b. Unauthorized local, network, and remote connections.
 2. Identify unauthorized use of the system.
 3. Invoke internal monitoring capabilities or deploy monitoring devices strategically within the system to collect organization-determined essential information.
 4. Analyze detected events and anomalies.
 5. Adjust the level of system monitoring activity when there is a change in risk to THA operations and assets, and individuals.
 6. Obtain legal opinion regarding system monitoring activities.
 7. Provide defined system monitoring information to the ISO as needed.

Enhancements

System-Wide Intrusion Detection System
 Connect and configure individual intrusion detection tools into a system-wide intrusion detection system.
 	
 Automated Tools and Mechanisms for Real-Time Analysis
 Employ automated tools and mechanisms to support near real-time analysis of events.
 	
 Automated Tool and Mechanism Integration
 Employ automated tools and mechanisms to integrate intrusion detection tools and mechanisms into access control and flow control mechanisms.
 	
 Inbound and Outbound Communications Traffic
   1. Determine criteria for unusual or unauthorized activities or conditions for inbound and outbound communications traffic.
   2. Monitor inbound and outbound communications traffic for unusual or unauthorized activities or conditions.

<table>
<tr><td>

System-Generated Alerts
Alert THA IT when system-generated indications of compromise or potential compromise occur.

Indicators of Compromise
Discover, collect, and distribute to THA IT, indicators of compromise.

</td></tr>
</table>

7.5 Security Alerts, Advisories, and Directives

Policy
1. Receive system security alerts, advisories, and directives on an ongoing basis. 2. Generate internal security alerts, advisories, and directives as deemed necessary. 3. Disseminate security alerts, advisories, and directives to appropriate THA personnel.

7.6 Spam Protection

Policy
1. Employ spam protection mechanisms at system entry and exit points to detect and act on unsolicited messages. 2. Update spam protection mechanisms when new releases are available in accordance with organizational configuration management policy and procedures.
Enhancements
Automated Updates Automatically update spam protection mechanisms.

7.7 Error Handling

Policy
1. Generate error messages that provide information necessary for corrective actions without revealing information that could be exploited.

7.8 Information Management and Retention

Policy
Manage and retain information within THA Systems and information output from the systems in accordance with applicable laws, regulations, policies, standards, guidelines and operational requirements.

7.9 Memory Protection

Policy
Implement the controls to protect system memory from unauthorized code execution.

7.10 Personal Data Quality Operations

Policy
1. Check the accuracy, relevance, timeliness, and completeness of personal data, and other regulated data, across the information life cycle. 2. Correct or delete inaccurate or outdated personal data. 3. Align with the Data Classification program.
Enhancements
Collection Collect personal data directly from the individual. **Individual Requests** Correct or delete personal data upon request by individuals or their designated representatives. **Notice of Correction or Deletion** Notify individuals that their personal data has been corrected or deleted.

7.11 De-identification

Policy
1. Remove appropriate elements of personal data and other regulated data types from datasets released for research purposes and data sharing agreements. 2. Evaluate at least annually for effectiveness of de-identification.

8.	**Compliance**

This policy is intended to support THA's compliance with the following information security compliance regulations and requirements:
- NIST SP 800-171

TACOMA HOUSING AUTHORITY

Policy No.	ISP-17
Policy	Audit and Accountability
Date	07/16/2021

1.	Purpose

This policy is intended to contribute information security guidance and assurance. The Audit and Accountability Policy serves to detail information security Audit and Accountability controls implemented, and planned to be implemented, by Tacoma Housing Authority (THA).

2.	Sources for Policy

- *NIST SP 800-53 r5 – Audit and Accountability (AU)*
- *ISO 27001/27002*

3.	Scope of Policy

The Audit and Accountability Policy serves as an organization-level policy and may obviate the need for department or system-specific policies. The policy applies to all Tacoma Housing Authority information systems, information system components, facilities, and personnel (including Tacoma Housing Authority executive management).

Tacoma Housing Authority leadership is committed to information security, the Tacoma Housing Authority Information Security Program, and the Information Security Policies. The primary mechanism by which Tacoma Housing Authority leadership demonstrates its commitment is by the approval of the policies.

This policy provides a detailed overview of controls employed by THA. While the controls in this policy apply to the entire organization, the specific control details may not be applicable to all roles within the organization. Whether general or specific knowledge of the controls is required for a job role will be made at the discretion of each department's management.

4.	Who is Responsible for Implementing Policy

Who	Responsibilities
Information Owner	THA Executive Director – The Information Owner is ultimately responsible for the security of Tacoma Housing Authority's information. The Information Owner may delegate risk ownership to specific risk owners as necessary and appropriate.
Information Security Program Sponsor	THA CIO – The Information Security Program Sponsor is responsible for approving the Information Security policies and Information Security Program Plan.
Information Security Officer	THA Senior Director of IT – The Information Security Officer (ISO) is responsible for the coordination,

	development, implementation, and maintenance of the organization-wide information security program.
Information Security Team	THA IT – The Information Security Team supports the ISO in the development, implementation, and maintenance of the information security program.
Tacoma Housing Authority Personnel	THA – All THA personnel are responsible to maintain general awareness of the THA information security policies, and to report suspected security incidents and anamolous activity to the Information Security Team.

5.   Approval

6.   Change Management

7.   Policy

7.1 Tacoma Housing Authority shall protect the confidentiality, integrity, and availability of its data and systems, regardless of how its data is created, distributed, or stored. As such, Tacoma Housing Authority personnel are required to protect and ensure the confidentiality, integrity, and availability of data and systems.

In support of this policy Tacoma Housing Authority maintains information security controls documented in the following Policy. These controls detail the application of Identification and Authenticationcontrols in place, or that are planned to be implemented, in a reasonable and appropriate manner.

7.2 Event Logging

Policy
1. Identify the types of events that systems are capable of logging in support of the audit function.
2. Coordinate the event logging function with other organizational departments requiring audit-related information to guide and inform the selection criteria for events to be logged.
3. Specify the event types for logging within THA systems.
4. Provide a rationale for why the event types selected for logging are deemed to be adequate to support after-the-fact investigations of incidents.
5. Review and update the event types selected for logging at least annually.

7.3 Content of Audit Log Records

Policy
Ensure that audit log records contain information that establishes the following: 1. What type of event occurred. 2. When the event occurred. 3. Where the event occurred. 4. Source of the event. 5. Outcome of the event. 6. Identity of any individuals, subjects, or objects/entities associated with the event.

7.4 Audit Log Storage Capacity

Policy
Allocate audit log storage capacity to accommodate THA audit log retention requirements.

7.5 Response to Audit Logging Process Failures

Policy
1. Alert THA IT in the event of an audit logging process failure. 2. Take the following additional actions: a. Overwrite the oldest logs.

7.6 Audit Record Review, Analysis, and Reporting

Policy
1. Review and analyze system audit records for indications of inappropriate or unusual activity and the potential impact of the inappropriate or unusual activity. 2. Report findings to the ISO. 3. Adjust the level of audit record review, analysis, and reporting within the system when there is a change in risk based on law enforcement information, intelligence information, or other credible sources of information.

Enhancements
Automated Process Integration Integrate audit record review, analysis, and reporting processes. **Correlate Audit Record Repositories** Analyze and correlate audit records across different repositories to gain organization-wide situational awareness. **Integrated Review and Analysis** Integrate analysis of audit records with analysis of vulnerability scanning information,

performance data, system monitoring information, and other THA-defined data/information collected from other sources to further enhance the ability to identify inappropriate or unusual activity.

7.7 Audit Record Reduction and Report Generation

Policy
Provide and implement an audit record reduction and report generation capability that: 1. Supports on-demand audit record review, analysis, and reporting requirements and after-the-fact investigations of incidents. 2. Does not alter the original content or time ordering of audit records.
Enhancements
Automated Processing Provide and implement the capability to process, sort, and search audit records for events of interest.

7.8 Time Stamps

Policy
1. Use internal system clocks to generate time stamps for audit records. 2. Record time stamps for audit records that meet THA-defined granularity of time measurement and that use Coordinated Universal Time, have a fixed local time offset from Coordinated Universal Time, or that include the local time offset as part of the time stamp.

7.9 Protection of Audit Information

Policy
1. Protect audit information and audit logging tools from unauthorized access, modification, and deletion. 2. Alert THA IT upon detection of unauthorized access, modification, or deletion of audit information.
Enhancements
Access by Subset of Privileged Users Authorize access to management of audit logging functionality to only THA-defined subset of privileged users or roles.

7.10 Audit Record Retention

Policy

Retain audit records for THA-defined time period consistent with records retention policy to provide support for after-the-fact investigations of incidents and to meet regulatory and organizational information retention requirements.

7.11 Audit Record Generation

Policy
1. Provide audit record generation capability for the event types the system is capable of auditing as defined in [Event Logging](#).   2. Allow THA-defined personnel or roles to select the event types that are to be logged by specific components of the system.   3. Generate audit records for the event types defined in [Event Logging](#) that include the audit record content defined in [Contents of the Audit Records](#).

7.12 Monitoring for Information Disclosure

Policy

1. Monitor open-source information and/or information sites for evidence of unauthorized disclosure of organizational information.
 2. If an information disclosure is discovered:
      a. Notify THA incident response team.
      b. Take the following additional actions:
          i. Initiate incident response processes.

8.	Compliance

This policy is intended to support THA's compliance with the following information security compliance regulations and requirements:

- NIST SP 800-171

TACOMA HOUSING AUTHORITY

Policy No.	ISP-18
Policy	Incident Response
Date	07/16/2021

1.	Purpose

This policy is intended to contribute information security guidance and assurance. The Incident Response Policy serves to detail security incident response controls implemented, and planned to be implemented, by Tacoma Housing Authority (THA).

2.	Sources for Policy

- *NIST SP 800-53 r5 – Incident Response (IR)*
- *ISO 27001/27002*

3.	Scope of Policy

The Incident Response Policy serves as an organization-level policy and may obviate the need for department or system-specific policies. The policy applies to all Tacoma Housing Authority information systems, information system components, facilities, and personnel (including Tacoma Housing Authority executive management).

Tacoma Housing Authority leadership is committed to information security, the Tacoma Housing Authority Information Security Program, and the Information Security Policies. The primary mechanism by which Tacoma Housing Authority leadership demonstrates its commitment is by the approval of the policies.

This policy provides a detailed overview of controls employed by THA. While the controls in this policy apply to the entire organization, the specific control details may not be applicable to all roles within the organization. Whether general or specific knowledge of the controls is required for a job role will be made at the discretion of each department's management.

4.	Who is Responsible for Implementing Policy

Who	Responsibilities
Information Owner	THA Executive Director – The Information Owner is ultimately responsible for the security of Tacoma Housing Authority's information. The Information Owner may delegate risk ownership to specific risk owners as necessary and appropriate.
Information Security Program Sponsor	THA CIO – The Information Security Program Sponsor is responsible for approving the Information Security policies and Information Security Program Plan.
Information Security Officer	THA Senior Director of IT – The Information Security Officer (ISO) is responsible for the coordination, development, implementation, and maintenance of the

	organization-wide information security program.
Information Security Team	THA IT – The Information Security Team supports the ISO in the development, implementation, and maintenance of the information security program.
Tacoma Housing Authority Personnel	THA – All THA personnel are responsible to maintain general awareness of the THA information security policies, and to report suspected security incidents and anamolous activity to the Information Security Team.

5. Approval

6. Change Management

7. Policy

7.1 Tacoma Housing Authority shall protect the confidentiality, integrity, and availability of its data and systems, regardless of how its data is created, distributed, or stored. As such, Tacoma Housing Authority personnel are required to protect and ensure the confidentiality, integrity, and availability of data and systems.

In support of this policy Tacoma Housing Authority maintains information security controls documented in the following Policy. These controls detail the application of Identification and Authenticationcontrols in place, or that are planned to be implemented, in a reasonable and appropriate manner.

7.2 Incident Response Training

Policy

1. Provide incident response training to system users consistent with assigned roles and responsibilities:
    a. Within three (3) months of assuming an incident response role or responsibility or acquiring system access.
    b. When required by system changes.
    c. For users with an incident response role or responsibility, at least annually thereafter.
2. Review and update incident response training content at least annually.

Enhancements
Simulated Events Incorporate simulated events into incident response training to facilitate the required

response by personnel in crisis situations.

Breach
Provide incident response training on how to identify and respond to a breach, including THA's process for reporting a breach or suspected breach.

7.3 Incident Response Testing

Policy

Test the effectiveness of the incident response capability for the system at least annually using the following tests:
    1. Tabletop exercises.
    2. Validating data backups.

Enhancements

Coordination with Related Plans
Coordinate incident response testing with THA departments responsible for related plans.
 	
Continuous Improvement
Use qualitative and quantitative data from testing to:
    1. Determine the effectiveness of incident response processes.
    2. Continuously improve incident response processes.
    3. Provide incident response measures and metrics that are accurate, consistent, and in a reproducible format.

7.4 Incident Handling

Policy
1. Implement an incident handling capability for incidents that is consistent with the incident response plan and includes preparation, detection and analysis, containment, eradication, and recovery. 2. Coordinate incident handling activities with contingency planning activities. 3. Incorporate lessons learned from ongoing incident handling activities into incident response procedures, training, and testing, and implement the resulting changes accordingly. 4. Ensure the rigor, intensity, scope, and results of incident handling activities are comparable and predictable across the organization. 5. Ensures proper chain of custody for all incident artifacts and evidence.
Enhancements
Information Correlation Correlate incident information and individual incident responses to achieve an organization-wide perspective on incident awareness and response.

Insider Threats
Implement an incident handling capability for incidents involving insider threats.

Malicious Code and Forensic Analysis
Analyze malicious code and/or other residual artifacts remaining in the system after the incident.

Public Relations and Reputation Repair
1. Manage public relations associated with an incident.
2. Employ measures to repair the reputation of the organization.

7.5 Incident Monitoring

Policy
1. Track and document incidents.

7.6 Incident Reporting

Policy
1. Require personnel to report suspected incidents to the THA Incident Response Team.   2. Report incident information to appropriate authorities when necessary.

Enhancements
Automated Reporting   Report incidents using automated mechanisms.

7.7 Incident Response Assistance

Policy
1. Provide an incident response support resource, integral to the THA Incident Response Team, that offers advice and assistance to users of the system for the handling and reporting of incidents.   2. Ensures the availability of forensic investigation capabilities, as needed.

7.8 Incident Response Plan

Policy

1. Develop an incident response plan that:
     a. Provides THA with a roadmap for implementing its incident response team.
     b. Describes the structure and organization of the incident response team.
     c. Provides a high-level approach for how the incident response team fits into the

overall organization.
   d. Meets the unique requirements of THA, which relate to mission, size, structure, and functions.
   e. Defines reportable incidents.
   f. Provides metrics for measuring the incident response capability within THA.
   g. Defines the resources and management support needed to effectively maintain and mature an incident response team.
   h. Addresses the sharing of incident information.
   i. Is reviewed and approved by the ISO at least annually.
   j. Explicitly designated responsibility for incident response to the THA Incident Response Team.
2. Distribute copies of the incident response plan to Incident Response Team personnel.
3. Update the incident response plan to address system and organizational changes or problems encountered during plan implementation, execution, or testing.
4. Communicate incident response plan changes to affected personnel.
5. Protect the incident response plan from unauthorized disclosure and modification.

Enhancements

Breaches
Include the following in the Incident Response Plan for breaches involving personally identifiable information:
1. A process to determine if notice to individuals or other organizations, including oversight organizations, is needed.
2. An assessment process to determine the extent of the harm, embarrassment, inconvenience, or unfairness to affected individuals and any mechanisms to mitigate such harms.
3. Identification of applicable privacy requirements.

8.	Compliance

This policy is intended to support THA's compliance with the following information security compliance regulations and requirements:
- NIST SP 800-171

TACOMA HOUSING AUTHORITY

Policy No.	ISP-19
Policy	Contingency Planning
Date	07/16/2021

1.	Purpose

This policy is intended to contribute information security guidance and assurance. The Contingency Planning Policy serves to detail contingency planning controls implemented, and planned to be implemented, by Tacoma Housing Authority (THA).

2.	Sources for Policy

- *NIST SP 800-53 r5 – Contingency Planning (CP)*
- *ISO 27001/27002*

3.	Scope of Policy

The Contingency Planning Policy serves as an organization-level policy and may obviate the need for department or system-specific policies. The policy applies to all Tacoma Housing Authority information systems, information system components, facilities, and personnel (including Tacoma Housing Authority executive management).

Tacoma Housing Authority leadership is committed to information security, the Tacoma Housing Authority Information Security Program, and the Information Security Policies. The primary mechanism by which Tacoma Housing Authority leadership demonstrates its commitment is by the approval of the policies.

This policy provides a detailed overview of controls employed by THA. While the controls in this policy apply to the entire organization, the specific control details may not be applicable to all roles within the organization. Whether general or specific knowledge of the controls is required for a job role will be made at the discretion of each department's management.

4.	Who is Responsible for Implementing Policy

Who	Responsibilities
Information Owner	THA Executive Director – The Information Owner is ultimately responsible for the security of Tacoma Housing Authority's information. The Information Owner may delegate risk ownership to specific risk owners as necessary and appropriate.
Information Security Program Sponsor	THA CIO – The Information Security Program Sponsor is responsible for approving the Information Security policies and Information Security Program Plan.
Information Security Officer	THA Senior Director of IT – The Information Security Officer (ISO) is responsible for the coordination, development, implementation, and maintenance of the

	organization-wide information security program.
Information Security Team	THA IT – The Information Security Team supports the ISO in the development, implementation, and maintenance of the information security program.
Tacoma Housing Authority Personnel	THA – All THA personnel are responsible to maintain general awareness of the THA information security policies, and to report suspected security incidents and anamolous activity to the Information Security Team.

5. Approval

6. Change Management

7. Policy

7.1 Tacoma Housing Authority shall protect the confidentiality, integrity, and availability of its data and systems, regardless of how its data is created, distributed, or stored. As such, Tacoma Housing Authority personnel are required to protect and ensure the confidentiality, integrity, and availability of data and systems.

In support of this policy Tacoma Housing Authority maintains information security controls documented in the following Policy. These controls detail the application of Identification and Authenticationcontrols in place, or that are planned to be implemented, in a reasonable and appropriate manner.

7.2 Contingency Plan

Policy

1. Develop a contingency plan for the system that:
   a. Identifies essential THA mission and business functions and associated contingency requirements.
   b. Provides recovery objectives, restoration priorities, and metrics.
   c. Base contingency plans on business impact analysis (BIA) assessments and recommendations, as well as risk assessment recommendations,
   d. Addresses contingency roles, responsibilities, assigned individuals with contact information.
   e. Addresses maintaining essential mission and business functions despite a system disruption, compromise, or failure.
   f. Addresses eventual, full system restoration without deterioration of the controls originally planned and implemented.
   g. Addresses the sharing of contingency information.

	h. Is reviewed and approved by CIO.

2. Distribute copies of the contingency plan to key contingency personnel and organizational departments.
3. Coordinate contingency planning activities with incident handling activities.
4. Review the contingency plan for THA systems at least annually.
5. Update the contingency plan to address changes to the organization, system, or environment of operation and problems encountered during contingency plan implementation, execution, or testing.
6. Communicate contingency plan changes to key contingency personnel and organizational departments.
7. Incorporate lessons learned from contingency plan testing, training, or actual contingency activities into contingency testing and training.
8. Protect the contingency plan from unauthorized disclosure and modification.

Enhancements

Capacity Planning
Conduct capacity planning so that necessary capacity for information processing, telecommunications, and environmental support exists during contingency operations.

Resume Mission and Business Functions
Plan for the resumption of essential mission and business functions within seven (7) days of contingency plan activation.

Continue Mission and Business Functions
Plan for the continuance of essential mission and business functions with minimal or no loss of operational continuity and sustains that continuity until full system restoration at primary processing and/or storage sites.

Identify Critical Assets
Identify critical system assets supporting essential mission and business functions.

7.3 Contingency Training

Policy

1. Provide contingency training to system users consistent with assigned roles and responsibilities:
     a. Within three (3) months of assuming a contingency role or responsibility.
     b. When required by system changes.
     c. For users with a contingency role or responsibility, at least annually thereafter.
2. Review and update contingency training content at least annually.

Enhancements

Simulated Events

Incorporate simulated events into contingency training to facilitate effective response by personnel in crisis situations.

7.4 Contingency Plan Testing

Policy
1. Test the contingency plan for THA systems at least annually using the following tests to determine the effectiveness of the plan and the readiness to execute the plan: a. Tabletop exercises 2. Review the contingency plan test results. 3. Initiate corrective actions, if needed.

7.5 Alternate Storage Site

Policy
1. Establish an alternate storage site, including necessary agreements to permit the storage and retrieval of system backup information. 2. Ensure that the alternate storage site provides controls equivalent to that of the primary site.

Enhancements
Separation from Primary Site Identify an alternate storage site that is sufficiently separated from the primary storage site to reduce susceptibility to the same threats. **Recovery Time and Recovery Point Objectives** Configure the alternate storage site to facilitate recovery operations in accordance with recovery time and recovery point objectives. **Accessibility** Identify potential accessibility problems to the alternate storage site in the event of an area-wide disruption or disaster and outline explicit mitigation actions.

7.6 Telecommunications Services

Policy
Establish alternate telecommunications services, including necessary agreements to permit the resumption of system operations for essential mission and business functions within seven (7) days when the primary telecommunications capabilities are unavailable at either the primary or alternate processing or storage sites.

7.8 System Backup

Policy
1. Conduct backups of user-level information contained in THA systems. 2. Conduct backups of system-level information contained in the system daily. 3. Conduct backups of system documentation, including security and privacy-related documentation daily. 4. Protect the confidentiality, integrity, and availability of backup information.

Enhancements
Testing for Reliability and Integrity Test backup information at least monthly to verify media reliability and information integrity. **Cryptographic Protection** Implement cryptographic mechanisms to prevent unauthorized disclosure and modification of backup information.

7.9 System Recovery and Reconstitution

Policy
1. Provide for the recovery and reconstitution of the system to a known state within seven (7) days after a disruption, compromise, or failure. 2. Align recovery and reconstitution programs with Incident Response, Disaster Recovery, Business Continuity, Risk Management, and Data Classification programs.

8.	Compliance

This policy is intended to support THA's compliance with the following information security compliance regulations and requirements:
- NIST SP 800-171

TACOMA HOUSING AUTHORITY

Policy No.	ISP-20
Policy	Data Privacy
Date	07/16/2021

1.	Purpose

This policy is intended to contribute information security guidance and assurance. The Data Privacy Policy serves to detail Data Privacy controls implemented, and planned to be implemented, by Tacoma Housing Authority (THA).

2.	Sources for Policy

- *NIST SP 800-53 r5 – Personnally Identifiable Information processing and Tranparency (PT)*
- *ISO 27001/27002*

3.	Scope of Policy

The Data Privacy Policy serves as an organization-level policy and may obviate the need for department or system-specific policies. The policy applies to all Tacoma Housing Authority information systems, information system components, facilities, and personnel (including Tacoma Housing Authority executive management).

Tacoma Housing Authority leadership is committed to information security, the Tacoma Housing Authority Information Security Program, and the Information Security Policies. The primary mechanism by which Tacoma Housing Authority leadership demonstrates its commitment is by the approval of the policies.

This policy provides a detailed overview of controls employed by THA. While the controls in this policy apply to the entire organization, the specific control details may not be applicable to all roles within the organization. Whether general or specific knowledge of the controls is required for a job role will be made at the discretion of each department's management.

4.	Who is Responsible for Implementing Policy

Who	Responsibilities
Information Owner	THA Executive Director – The Information Owner is ultimately responsible for the security of Tacoma Housing Authority's information. The Information Owner may delegate risk ownership to specific risk owners as necessary and appropriate.
Information Security Program Sponsor	THA CIO – The Information Security Program Sponsor is responsible for approving the Information Security policies and Information Security Program Plan.
Information Security Officer	THA Senior Director of IT – The Information Security Officer (ISO) is responsible for the coordination,

	development, implementation, and maintenance of the organization-wide information security program.
Information Security Team	THA IT – The Information Security Team supports the ISO in the development, implementation, and maintenance of the information security program.
Tacoma Housing Authority Personnel	THA – All THA personnel are responsible to maintain general awareness of the THA information security policies, and to report suspected security incidents and anamolous activity to the Information Security Team.

5.	Approval

6.	Change Management

7.	Policy

7.1 Tacoma Housing Authority shall protect the confidentiality, integrity, and availability of its data and systems, regardless of how its data is created, distributed, or stored. As such, Tacoma Housing Authority personnel are required to protect and ensure the confidentiality, integrity, and availability of data and systems.

In support of this policy Tacoma Housing Authority maintains information security controls documented in the following Policy. These controls detail the application of Identification and Authenticationcontrols in place, or that are planned to be implemented, in a reasonable and appropriate manner.

7.2 Dissemination of Privacy Program Information

Policy
Maintain a central resource webpage on the THA principal public website that serves as a central source of information about the organization's privacy program and that: 1. Ensures that the public has access to information about THA privacy activities and can communicate with THA for privacy.   2. Ensures that THA privacy practices and reports are available to appropriate parties.   3. Employs publicly facing email addresses and/or phone lines to enable the public to provide feedback and/or direct questions to THA regarding privacy practices.

7.3 Personal Data Quality Management

Policy

Develop and document organization-wide policies, and procedures as necessary, for:
1. Reviewing for the accuracy, relevance, timeliness, and completeness of personal data across the information life cycle.
2. Correcting or deleting inaccurate or outdated personal data.
3. Disseminating notice of corrected or deleted personal data to individuals or other appropriate entities.
4. Appeals of adverse decisions on correction or deletion requests.

7.4 Minimization of Personal Data Used in Testing, Training, and Research

Policy
1. Develop, document, and implement policies and procedures that address the use of personally identifiable information for internal testing, training, and research. 2. Limit or minimize the amount of personally identifiable information used for internal testing, training, and research purposes. 3. Authorize the use of personally identifiable information when such information is required for internal testing, training, and research. 4. Review and update policies and procedures at least annually.

7.5 Complaint Management

Policy

Implement a process for receiving and responding to complaints, concerns, or questions from individuals about THA security and privacy practices that includes:
    1. Mechanisms that are easy to use and readily accessible by the public.
    2. All information necessary for successfully filing complaints.
    3. Tracking mechanisms to ensure all complaints received are reviewed and addressed.
    4. Acknowledgement of receipt of complaints, concerns, or questions from individuals.
    5. Response to complaints, concerns, or questions from individuals.

7.6 Data Privacy Impact Assessments

Policy

Conduct privacy impact assessments for systems, programs, or other activities before:
    1. Developing or procuring information technology that processes personal data; and
    2. Initiating a new collection of personal data that:
        a. Will be processed using information technology.
        b. Includes personal data permitting the physical or virtual (online) contacting of a specific individual, if identical questions have been posed to, or identical reporting requirements imposed on, ten or more individuals.

7.7 Consent

Policy
Implement tools or mechanisms for individuals to consent to the processing of their personal data prior to its collection that facilitate individuals' informed decision-making.

Enhancements
Revocation Implement tools or mechanisms for individuals to revoke consent to the processing of their personally identifiable information.

7.8 Privacy Notice

Policy
Provide notice to individuals about the processing of personally identifiable information that: 1. Is available to individuals upon first interacting with THA. 2. Is clear and easy-to-understand, expressing information about personal data processing in plain language. 3. Identifies the authority that authorizes the processing of personal data. 4. Identifies the purposes for which personal data is to be processed.

8.	Compliance

This policy is intended to support THA's compliance with the following information security compliance regulations and requirements:
- NIST SP 800-171

Resolution 2

TACOMA HOUSING AUTHORITY

RESOLUTION 2021-09-22 (2)

DATE: September 22, 2021

TO: THA Board of Commissioners

FROM: April Black
               Interim Executive Director

RE: Utility Allowance Schedule Update

This resolution will adopt updated utility allowance schedules that will be used for the incomebased calculation of rent for the Tacoma Housing Authority rental assistance programs.

Background

Every year, Tacoma Housing Authority (THA) reviews its utility allowances. During this review, THA must determine if new rates will change THA's utility allowances. THA must update any bedroom size utility allowance showing a change of 10% or more to reflect the new utility rates.

Analysis

Through a partnership with Tacoma Public Utilities (TPU), THA has been able to collect regular updates to electrical consumption and rates. This allows THA to regularly update its own schedule using a rolling average of local data. For this analysis, the 2020 utility consumption and published 2021 rates for energy, water, sewer and garbage were analyzed using the approved methodology developed with Seasholtz Consulting Inc.

Proposal

As is shown in the chart below there was not a ten percent change in any category. However, we are recommending that we adopt the proposed utility allowances outlined below, to be effective November 1, 2021. We recommend this increase because there was not an increase at the last review and we want to ensure our UA's reflect the most current rates and usage.

PROPOSED Utility Allowance Schedule (8/30/2021)						
Pays Sewer/Water	**0-BD**	**1-BD**	**2-BD**	**3-BD**	**4-BD**	**5+BD**
Landlord	**$58**	**$62**	**$78**	**$102**	**$127**	**$140**
Tenant	**$149**	**$155**	**$194**	**$246**	**$300**	**$339**
CURRENT Utility Allowance Schedule as of (4/1/2020)						
Pays Sewer/Water	**0-BD**	**1-BD**	**2-BD**	**3-BD**	**4-BD**	**5+BD**
Landlord	$58	$59	$73	$101	$123	$140
Tenant	$147	$148	$188	$243	$291	$334
Percent Change from Existing UA to Proposed New Numbers						
Landlord % Change	0.0%	5.1%	6.8%	1.0%	3.3%	0.0%
Tenant % Change	1.4%	4.7%	3.2%	1.2%	3.1%	1.5%

Recommendation

Approve Resolution 2021-09-22 (2) authorizing THA to adopt all proposed bedroom size utility allowances according to the chart above, effective December 1, 2021.

TACOMA HOUSING AUTHORITY

RESOLUTION 2021-09-22 (2)
(UTILITY ALLOWANCES UPDATE)

WHEREAS, Utility allowances must be reviewed annually; and

WHEREAS, PHAs must revise utility allowances if they change more than ten percent; and

WHEREAS, Changes to the utility allowances must be approved by the Board of Commissioners; now, therefore, be it

Resolved by the Board of Commissioners of the Housing Authority of the City Of Tacoma, Washington, that:

1. Authorizes THA to adopt all bedroom size utility allowances, effective December 01, 2021 according to the chart below.

Pays Sewer/Water	0-BD	1-BD	2-BD	3-BD	4-BD	5+BD
Landlord	$58	$62	$78	$102	$127	$140
Tenant	$149	$155	$194	$246	$300	$339

Approved: September 22, 2021

_____

Stanley Rumbaugh, Chair

Resolution 3

TACOMA HOUSING AUTHORITY

RESOLUTION 2021-09-22 (3)

Date: September 22, 2021

To: THA Board of Commissioners

From: April Black
Interim Executive Director

Re: Update to Payment Standards

This resolution would authorize Tacoma Housing Authority (THA) to adopt new payment standards for use in THA's rental assistance programs.

Background

Each year the Department of Housing and Urban Development (HUD) releases rent data for the Tacoma-Pierce County metropolitan rental market. These data set HUD's "fair market rents" (FMR) for our area for the following year, in this case, 2022. Housing authorities must set their payment standards within 90-110% of the HUD FMR. The payment standards are then used in determining the maximum amount of subsidy THA will pay to landlords. They are also used in the calculation of THA tenant and participant rents.

THA is required to complete an assessment of its tenant data and make adjustments to its payment standards based on this data. In addition to tenant data, THA uses a compilation of 3rd party reports and data to assess the region's rental market. The payment standards were last changed effective January 2021 as outlined later in this memo.

The following table compares the new HUD 2022 FMRs to the existing 2021 FMRs:

	FY2021 FMRs	FY2022 FMRs	$ Change	FMR % Change From 2020 - 2021
Studio	$1011	$1,056	$45	4.5%
1 bedroom	$1126	$1,162	$36	3.2%
2 bedroom	$1461	$1,484	$23	1.6%
3 bedroom	$2091	$2,108	$17	0.8%
4 bedroom	$2530	$2,540	$10	0.4%
5 bedroom	$2909	$2,921	$12	0.4%
6 bedroom	$3289	$3,302	$13	0.4%
7 bedroom	$3668	$3,683	$15	0.4%
8 bedroom	$4048	$4,064	$16	0.4%

THA staff considers the following factors during the payment standard review:
- shelter burden (% of household income paid for rent and utilities)
- vacancy rate and rent by Tacoma neighborhood
- comparison of current payment standards with current average Tacoma rents
- inspection pass or fail rates
- how long it takes clients to find a unit under the current payment standards
- the extent to which clients cannot use a voucher
- the extent to which clients seek to take their voucher to other jurisdictions
- requests for rent increases and the average amount
- the overall financial impact on THA

1. **Shelter Burden (% of households paying more than 30% of income towards rent)**
   HUD has established a standard that households paying than 30% of their income toward rent are considered rent or shelter burdened. When a household selects a unit where the gross rent (rent & utilities) exceeds the payment standard the household pays the difference. This results in a larger out of pocket expense for the client. Increasing the payment standards helps offset some of that expense.

   1.1. **September 2020** – 31% of traditional HCVs and 50% of HOP clients were paying more than 30% of their income toward rent.

   1.2. **August 2021 -** 38% of traditional HCVs and 58% of HOP clients were paying more than 30% of their income toward rent.

   The average rent burden for HCV is 31.3%, but 38.2% of all HCV households pay more than 30% of their income to rent. The average rent burden for HOP is 38.4%, but more than half (58.1%) of all HOP households pay more than 30% of their income to rent. This is because in most cases HOP provides a shallower subsidy in order to serve more households. Overall, households face a steeper shelter burden than in past years.

2. **Vacancy Rate and Rent by Tacoma Neighborhood**
   A lower vacancy rate and higher rents make it difficult for clients to compete for units. Increasing the payment standards helps them compete for those units with less out of pocket expenses.

   In the past, THA has relied heavily on the vacancy report provided by Dupre & Scott. That company went out of business in January 2018. THA has been using various compilations of on-line resources and a rental property survey that McCament and Rogers conduct twice a year. McCament and Rogers is a real estate consulting firm that also does market studies for the City of Tacoma and Lakewood. Within the report, McCament & Rogers separates the market into four categories: low-income, affordable, market-rate, and outside downtown.

   McCament & Rogers defines low-income, affordable, and market-rate in the following ways:

- **Low-Income rents** have some sort of subsidy attached to them but could have some affordable units not subsidized within the community.

- **Affordable rents** would be communities that are older and mostly smaller units, however, on dollar per square foot, some are as high as market rate.

- **Market rents** would be the rent on most newer properties set at the highest rate the market will bear. The current communities adjust the rents on a daily basis depending on demand. For example one day a one-bedroom may be $1500 the next it could be $1200 because they have some vacancy in that style of unit.

Below is a comparison of last year's and this year's vacancy rates and average two bedroom rent across those four categories:

Q3 2020 (McCament and Rogers Survey)

	Low Income	Affordable Market	Market Rate	Out of Downtown
Vacancy Rate (%)	1%	3%	5%	3%
Average Rent ($) 2 Bdrm	$1018	$1918	$2498	$2525

Q2 2021 (McCament and Rogers Survey)

	Low Income	Affordable Market	Market Rate	Out of Downtown
Vacancy Rate (%)	1%	2%	2%	2%
Average Rent ($) 2 Bdrm	$996	$1945	$2291	$2553

3. **Comparison of Current Payment Standard and Rents**
Comparing the current payment standards to actual rents THA is paying for units provides a metric that can help determine the affordability of an increase. This is important in our dynamic market to allow increases that keep pace with real-time asking rents.

The following table compares the **current** payment standards and the actual average contract rent amount for new admissions and movers in the HOP & HCV programs, excluding PBVs.

	Current Payment Standards	Avg Contract Rent 2019-2020	Avg Contract Rent This Year
Studio	$991	$894	$1009
1 bedroom	$1075	$989	$1046
2 bedroom	$1408	$1245	$1371
3 bedroom	$2031	$1680	$1712
4 bedroom	$2472	$1802	$2165
5 bedroom	$2843	$2369	$2905

4. **HQS Pass/Fail Rates**

Tracking the pass/fail rates of initial unit inspections provides a measurement that is used to determine if the payment standard amounts are allowing clients to select higher quality units.

Currently, a little over 85% of all units selected by clients pass inspections. This is based on comparing the number of initial inspections in relation to the number of failures. This is an increase from last year's 75%.

Dispostion of Inspections
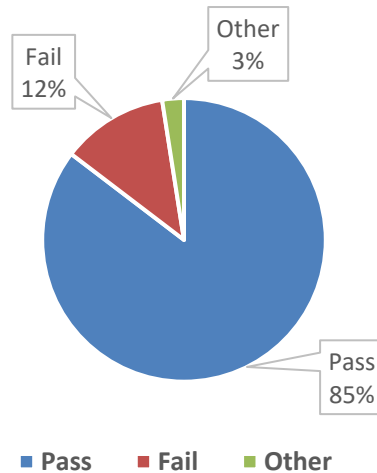
5. **Shopping Days**

Tracking the amount of time it takes for our clients to find and secure a unit helps determine if the payment standards give them sufficient buying power in the market. A longer shopping time could mean that the payment standard is not competitive with the market rate rents.

In 2021 we saw an increase from 34 to 61 days for traditional vouchers and a decrease from 42 to 31 days for the Housing Opportunity Program (HOP) clients.

Average Days Shopping by Program for 8/1/2020 - 8/1/2021

Program	Days
Traditional Vouchers (n=126)	64
VASH (n=9)	57
Tacoma Community College (n=7)	28
Non-Elderly Disabled (n=3)	58
Housing Opportunity Program (n=38)	35
Family Unification Program (n=25)	65
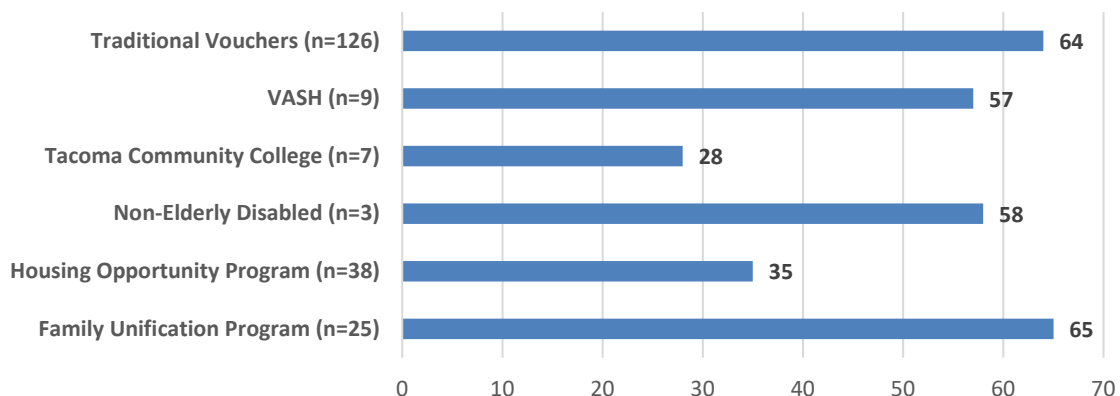
6. **Expired and Unused Vouchers**
Returned subsidies can be a barometer for client shopping success as well. An increase in returned subsidies could indicate an inability to compete for units in the market. Of the 475 vouchers issued so far this year, 99 subsidies (21%) have expired or, gone unused so far from August 1, 2020 through August 1, 2021. This is a slight decrease from 22% (996/223) in 2019. The chart below shows the breakdown of the major programs. These vouchers include households shopping for housing while new to the program and households hoping to move between assisted units.

Expired and Unused Vouchers (08/01/2020 -08/01/2021)

- Housing Opportunity Program
- VASH
- Traditional Voucher
- Special Programs
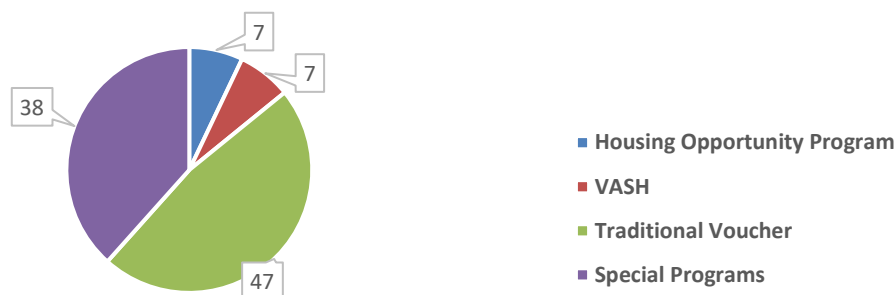
7. **Port Outs**
Tracking the number of clients leaving our jurisdiction provides an indicator that could mean they are searching for an affordable unit elsewhere. 178 clients have ported out so far in 2021. In 2020, there were 363 total port-outs.

8. **Rent Increases Processed**
So far in 2021, staff have processed 1,271 rent change requests. The average increase is approximately $96.00. In 2020, staff processed 969 rent increase requests before the various moratoriums related to the COVID-19 pandemic were implemented in March of that year. The average increase then was approximately $129.00. Since the 2020 data is incomplete, we're including the previous year's data. In 2019 there were 2036 total requests and the average request amount of $97.00.

We anticipated a much larger average increase amount with the moratoriums on rent increases lifting. However, this has not been the case. While they all came at the same time, we are seeing almost the same amount of requests as previous years with nearly the same average request amount.

9. **Estimated Financial Impact on THA**
Aside from processing referrals for our special programs, THA is not currently leasing to additional people off the waitlist at this time, so an immediate analysis is hard to review. However, for most participants, their portion changes only when there is a qualifying event. Therefore, we believe any impact would be minimal and spread out over time.

The Finance Department is in support of increasing the payment standards this year.

Recommendation

Analysis findings in favor of increasing the payment standards:
- There has been a notable increase in the overall shelter and rent burden rate among participants.
- We are seeing a decrease in the already extremely low vacancy rates.
- Rents are slightly, but steadily increasing across most sectors and the current two-bedroom payment standards are below the reported average rent for a two bedroom.
- The average number of shopping days for clients on the traditional voucher program has increased – it is important to note however that this may be due to difficulty securing units during the COVID-19 pandemic.

Analysis findings in favor of retaining the current payment standards:
- The average rent for THA clients is below the existing payment standards.
- Reduced number of expired vouchers – this may be due to the allowance of extensions due to COVID-19.
- Reduced number of port-outs – this could also be due to COVID-19 and THA policy changes.
- Somewhat surprisingly, the average rent increase request amounts have remained the same.

Final Recommendation

After a review of our current payment standards and the other factors listed in this analysis, we recommend setting all bedroom sizes at 100% of the new 2022 FMRs. This will increase each bedroom size payment standard by a reasonable percentage. Setting our payment standards at these amounts will grant our participants a little more stability in these unknown times. Due to the uncertainty of the pandemic and the changing requirements of the Pierce County late rent program, Rental Assistance will conduct this analysis again in 6 months and will present a recommendation to the Board if applicable.

	Current Payment Standards	FY2022 FMRs	Proposed Payment Standards	% of the FMR	% Increase from current PS	Proposed HOP Subsidy Amount
Studio	$991	$1,056	$1,056	100%	7%	$528
1 bedroom	$1,075	$1,162	$1,162	100%	8%	$581
2 bedroom	$1,408	$1,484	$1,484	100%	5%	$742
3 bedroom	$2,031	$2,108	$2,108	100%	4%	$1,054
4 bedroom	$2,472	$2,540	$2,540	100%	3%	$1,270
5 bedroom	$2,843	$2,921	$2,921	100%	3%	$1,461
6 bedroom	$3,214	$3,302	$3,302	100%	3%	$1,651
7 bedroom	$3,584	$3,683	$3,683	100%	3%	$1,842
8 bedroom	$3,955	$4,064	$4,064	100%	3%	$2,032

Staff recommends approving Resolution 2021-09-22 (3) authorizing THA to adopt new payment standards effective December 1, 2021.

TACOMA HOUSING AUTHORITY

RESOLUTION 2021-09-22 (3)
(Update to Payment Standards)

A **RESOLUTION** of the Board of Commissioners of the Housing Authority of the City of Tacoma authorizing the THA Executive Director to increase THA's payment standards.

WHEREAS, HUD sets fair market rents annually; and

WHEREAS, the housing authority sets payment standards based on market and participant data; and

WHEREAS, new payment standards will go into effect December 01, 2021; now, therefore, be it

Resolved by the Board of Commissioners of the Housing Authority of the City of Tacoma, Washington as follows:

The Board authorizes THA's Executive Director to set THA's payment standards for all bedroom sizes at 100% of the 2022 HUD Fair Market Rents.

Approved: September 22, 2021

_____
Stanley Rumbaugh, Chair

Resolution 4

TACOMA HOUSING AUTHORITY

RESOLUTION 2021-09-22 (4)

Date: September 22, 2021

To: THA Board of Commissioners

From: April Black
Interim Executive Director

Re: Revising THA's Administrative Plan: Emergency Housing Voucher Program

---

This resolution would authorize Tacoma Housing Authority (THA) to update its Administrative Plan to administer the Emergency Housing Voucher Program (EHV).

Background

The 2021 American Rescue Plan Act created the Emergency Housing Voucher (EHV) program funded through the US Department of Housing and Urban Development (HUD) and administered by local housing authorities. To date, Tacoma Housing Authority (THA) received one-hundred thirty-five (135) EHVs. The federal rules for the EHV program require THA to update its Administrative Plan to administer the program.

Proposed Revisions

THA will create a temporary policy supplement for the EHV program that complies with **Notice PIH 2021-15: Emergency Housing Vouchers – Operating Requirements.** The temporary policy supplement will be Chapter 20 of the Administrative Plan.

Recommendation

Authorize THA's Interim Executive Director to make program changes to administer the EHV program as outlined in resolution **2021-09-22 (4).** This would create a new chapter (20) in THA's Administrative Plan.

TACOMA HOUSING AUTHORITY

RESOLUTION 2021-09-22 (4)
(Revising THA's Administrative Plan: Emergency Housing Voucher Program)

WHEREAS, the Administrative Plan relates to the administration of THA's voucher programs and is required by HUD; and

WHEREAS, the purpose of the Administrative Plan is to establish policies for carrying out programs in a manner consistent with HUD requirements and local goals and objectives contained in THA's Moving to Work plan; and

WHEREAS, THA was awarded 135 Emergency Housing Vouchers (EHV); and

WHEREAS, THA must update its Administrative Plan to administer the EHV program;

WHEREAS, Changes to the Administrative Plan must be approved by THA Board of Commissioners; now, therefore, be it

Resolved by the Board of Commissioners of the Housing Authority of the City Of Tacoma, Washington, that:

THA's Interim Executive Director is authorized to revise THA's Administrative Plan adding the following chapter for the administration of the EHV program:

CHAPTER 20 - EMERGENCY HOUSING VOUCHERS (EHVs) TEMPORARY POLICY SUPPLEMENT

INTRODUCTION

On May 5, 2021, HUD issued Notice PIH 2021-15, which described HUD's process for allocating approximately 70,000 EHVs to eligible PHAs and set forth the operating requirements for PHAs who administer them. Based on criteria outlined in the notice, HUD notified eligible PHAs of the number of EHVs allocated to their agency, and PHAs were able to accept or decline the invitation to participate in the program.

PHAs may not project-base EHVs; EHVs are exclusively tenant-based assistance.

All applicable nondiscrimination and equal opportunity requirements apply to the EHV program, including requirements that the PHA grant reasonable accommodations to persons with disabilities, effectively communicate with persons with disabilities, and ensure meaningful access for persons with limited English proficiency (LEP).

This chapter describes HUD regulations and THA policies for administering EHVs. The policies outlined in this chapter are organized into seven sections, as follows:

Part I: Funding

Part II: Partnering Agencies

Part III: Waiting List Management

Part IV: Family Eligibility

Part V: Housing Search and Leasing

Part VI: Use of Funds, Reporting, and Financial Records

Except as addressed by this chapter and as required under federal statute and HUD requirements, the general requirements of the HCV program apply to EHVs.

PART I: FUNDING

TPS-I.A. FUNDING OVERVIEW

The American Rescue Plan Act of 2021 (ARP) provides administrative fees and funding for the costs of administering emergency housing vouchers (EHVs) and other eligible expenses defined in Notice PIH 2021-15. These fees may only be used for EHV administration and other eligible expenses and must not be used for or applied to other PHA programs or vouchers. The PHA must maintain separate financial records from its regular HCV funding for all EHV funding.

Housing Assistance Payments (HAP) Funding

ARP funding obligated to the PHA as housing assistance payments (HAP) funding may only be used for eligible EHV HAP expenses (i.e., rental assistance payments). EHV HAP funding may not be used for EHV administrative expenses or for the eligible uses under the EHV services fee.

The initial funding term will expire December 31, 2022. HUD will provide renewal funding to

the PHA for the EHVs on a calendar year (CY) basis commencing with CY 2023. The renewal funding allocation will be based on the PHA's actual EHV HAP costs in leasing, similar to the renewal process for the regular HCV program. EHV renewal funding is not part of the annual HCV renewal funding formula; EHVs are renewed separately from the regular HCV program. All renewal funding for the duration of the EHV program has been appropriated as part of the ARP funding.

Administrative Fee and Funding

The following four types of fees and funding are allocated as part of the EHV program:

- **Preliminary fees** support immediate start-up costs that the PHA will incur in implementing alternative requirements under EHV, such as outreach and coordination with partnering agencies:
  - $400 per EHV allocated to the PHA, once the consolidated annual contributions contract (CACC) is amended.
  - This fee may be used for any eligible administrative expenses related to EHVs.
  - The fee may also be used to pay for any eligible activities under EHV service fees (TPS-I.B).

- **Placement fees/expedited issuance reporting fees will support initial lease-up costs and the added cost and effort required to expedite leasing of EHVs:**

  - $100 for each EHV initially leased, if the PHA reports the voucher issuance date in Public Housing Information Center (PIC) or Public Housing Information Center–Next Generation (PIC–NG) system within 14 days of voucher issuance or the date the system becomes available for reporting.
  - Placement fees:
    - ○ $500 for each EHV family placed under a HAP contract effective within four months of the effective date of the ACC funding increment; or
    - ○ $250 for each EHV family placed under a HAP contract effective after four months but less than six months after the effective date of the ACC funding increment.
    - ○ HUD will determine placement fees in the event of multiple EHV allocations and funding increment effective dates.
  - Placement/expedited issuance fees only apply to the initial leasing of the voucher; they are not paid for family moves or to turnover vouchers.
- **Ongoing administrative fees,** which are calculated in the same way as the standard HCV program:
  - PHAs are allocated administrative fees using the full column A administrative fee amount for each EHV under contract as of the first day of each month.

- Ongoing EHV administrative fees may be subject to proration in future years, based on available EHV funding.

- **Services fees,** which are a one-time fee to support PHAs' efforts to implement and operate an effective EHV services program in its jurisdiction (TPS-I.B):

  - The fee is allocated once the PHA's CACC is amended to reflect EHV funding.

  - The amount allocated is $3,500 for each EHV allocated.

TPS-I.B. SERVICE FEES

Services fee funding must be initially used for defined eligible uses and not for other administrative expenses of operating the EHV program. Service fees fall into four categories:

- Housing search assistance

- Security deposit/utility deposit/rental application/holding fee uses

- Owner-related uses

- Other eligible uses such as moving expenses or tenant-readiness services

The PHA must establish the eligible uses and the parameters and requirements for service fees in the PHA's administrative plan.

> THA Policy
>
> THA contracted with Pierce County Human Services to administer services to EHV participants. The eligible uses for service fees include:
>
> **Housing search assistance,** which may include activities such as, but not limited to:
>
> > - assisting with the completion of rental applications, THA forms and obtaining supporting documentation required for referrals.
> > - helping a family identify and visit units
> > - providing transportation and directions
> > - helping to find a unit that meets the household's disability-related needs
> > - helping to expedite the EHV leasing process for the family
>
> **Application fees/non-refundable administrative or processing fees/refundable application deposit assistance.**
>
> **Holding fees**.
>
> **Security deposit assistance.** The amount of the security deposit assistance may not exceed the lesser of two months' rent to owner, the maximum security deposit allowed under applicable state and/or local law, or the actual security deposit

required by the owner. Security deposit assistance must be paid directly to the owner.

Utility deposit assistance/utility arrears.

Owner recruitment and outreach for EHVs.

Owner incentive and/or retention payments.

Moving expenses. THA may provide assistance for some or all of the family's reasonable moving expenses when they initially lease a unit with the EHV. The PHA may not provide moving expenses assistance for subsequent moves unless the family is required to move for reasons other than something the family did or failed to do (e.g., THA is terminating the HAP contract because the owner did not fulfill the owner responsibilities under the HAP contract or the owner is refusing to offer the family the opportunity to enter a new lease after the initial lease term, as opposed to the family choosing to terminate the tenancy in order to move to another unit), or a family has to move due to domestic violence, dating violence, sexual assault, or stalking, for example**.**

Tenant-readiness services.

Essential household items. THA may use the services fee funding to assist the family with some or all of the costs of acquiring essential household items (e.g., tableware, bedding, etc.)..

Renter's insurance if required by the lease.

Any services fee assistance that is returned to the THA after its initial or subsequent use may only be applied to the eligible services fee uses defined in Notice PIH 2021-15 (or subsequent notice) or other EHV administrative costs. Any amounts not expended for these eligible uses when THA's EHV program ends must be remitted to HUD.

PART II: PARTNERING AGENCIES

TPS-II.A. CONTINUUM OF CARE (CoC)

PHAs that accept an allocation of EHVs are required to enter into a Memorandum of Understanding (MOU) with the Continuum of Care (CoC) to establish a partnership for the administration of EHVs.

<u>THA Policy</u>

THA entered into an MOU with *the Tacoma/Lakewood/Pierce County Continuum of Care (CoC).*

TPS-II.B. OTHER PARTNERING ORGANIZATIONS

The PHA may, but is not required to, partner with other organizations trusted by persons experiencing homelessness, such as victim services providers (VSPs) and other community partners. If the PHA chooses to partner with such agencies, the PHA must either enter into an MOU with the partnering agency or the partnering agency may be added to the MOU between the PHA and CoC.

The PHA has added **Pierce County Human Services** to the MOU between the THA and the CoC.

TPS-II.C. REFERRALS

CoC and Partnering Agency Referrals

The primary responsibility of the CoC under the MOU with the PHA is to make direct referrals of qualifying individuals and families to the PHA. The PHA must generally refer a family that is seeking EHV assistance directly from the PHA to the CoC or other referring agency for initial intake, assessment, and possible referral for EHV assistance. Partner CoCs are responsible for determining whether the family qualifies under one of the four eligibility categories for EHVs. The CoC or other direct referral partner must provide supporting documentation to the PHA of the referring agency's verification that the family meets one of the four eligible categories for EHV assistance.

> THA Policy
>
> Pierce County's Coordinated Entry system will refer EHVeligible individuals and families to THA according to the preferences and referral streams identified in the MOU. The Coordinated Entry system must certify that the EHV applicants they refer to THA meet at least one of the four EHV eligibility criteria. THA will maintain a copy of the referral or certification from Coordinated Entry in the participant's file along with other eligibility paperwork.

Offers of Assistance with CoC Referral

The PHA may make an EHV available without a referral from the CoC or other partnering organization in order to facilitate an emergency transfer under VAWA in accordance with the PHA's Emergency Transfer Plan.

The PHA must also take direct referrals from outside the CoC if:

- The CoC does not have a sufficient number of eligible families to refer to the PHA; or

- The CoC does not identify families that may be eligible for EHV assistance because they are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking or human trafficking.

If at any time the PHA is not receiving enough referrals or is not receiving referrals in a timely manner from the CoC or other partner referral agencies (or the PHA and CoC cannot identify any such alternative referral partner agencies), HUD may permit the PHA on a temporary or permanent basis to take EHV applications directly from applicants and admit eligible families to the EHV program in lieu of or in addition to direct referrals in those circumstances.

PART III: WAITING LIST MANAGEMENT

TPS-III. A. HCV WAITING LIST

The regulation that requires the PHA to admit applicants as waiting list admissions or special admissions in accordance with admission policies in Chapter 4 does not apply to PHAs operating the EHV program. Direct referrals are not added to the PHA's HCV waiting list.

The PHA must inform families on the HCV waiting list of the availability of EHVs by, at a minimum, either by posting the information to their website or providing public notice in their respective communities in accordance with the requirements listed in Notice PIH 2021-15.

> THA Policy
>
> The PHA will post information about the EHV program for families on the PHA's HCV waiting list on their website. The notice will:
>
>> Describe the eligible populations to which EHVs are limited
>>
>> Clearly state that the availability of these EHVs is managed through a direct referral process
>>
>> Advise the family to contact the CoC (or any other PHA referral partner, if applicable) if the family believes they may be eligible for EHV assistance
>
> The PHA will ensure effective communication with persons with disabilities, including those with vision, hearing, and other communication-related disabilities in accordance with Chapter 2. The PHA will also take reasonable steps to ensure meaningful access for persons with limited English proficiency (LEP) in accordance with Chapter 2.

TPS-III.B. EHV WAITING LIST

The HCV regulations requiring the PHA to operate a single waiting list for admission to the HCV program do not apply to PHAs operating the EHV program. Instead, when the number of applicants referred by the CoC or partnering agency exceeds the EHVs available, the PHA must maintain a separate waiting list for EHV referrals, both at initial leasing and for any turnover vouchers that may be issued prior to September 30, 2023.

Further, the EHV waiting list is not subject to PHA policies in Chapter 4 regarding opening and closing the HCV waiting list. The PHA will work directly with its CoC and other referral agency partners to manage the number of referrals and the size of the EHV waiting list.

TPS-III.C. PREFERENCES

HCV Waiting List Preferences

If local preferences are established by the PHA for HCV, they do not apply to EHVs. However, if the PHA has a homeless preference or a VAWA preference for the HCV waiting list, the PHA must adopt additional policies related to EHVs in accordance with Notice PIH 2021-15.

> THA Policy
>
> The PHA does not offer either a homeless or a VAWA preference for the HCV waiting list.

EHV Waiting List Preferences

With the exception of a residency preference, the PHA may choose, in coordination with the

CoC and other referral partners, to establish separate local preferences for EHVs. The PHA may, however, choose to not establish any local preferences for the EHV waiting list.

<u>THA Policy</u>

No local preferences have been established for the EHV waiting list.

PART IV: FAMILY ELIGIBLTY

TPS-IV.A. OVERVIEW

The CoC or referring agency determines whether the individual or family meets any one of the four eligibility criteria described in Notice PIH 2021-15 and then refers the family to the PHA. The PHA determines that the family meets other eligibility criteria for the HCV program, as modified for the EHV program and outlined below.

TPS-IV.B. REFERRING AGENCY DETERMINATION OF ELIGIBLITY

In order to be eligible for an EHV, an individual or family must meet one of four eligibility criteria:

- Homeless as defined in 24 CFR 578.3;

- At risk of homelessness as defined in 24 CFR 578.3;

- Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking (as defined in Notice PIH 2021-15), or human trafficking (as defined in the 22 U.S.C. Section 7102); or

- Recently homeless and for whom providing rental assistance will prevent the family's homelessness or having high risk of housing instability as determined by the CoC or its designee in accordance with the definition in Notice PIH 2021-15.

As applicable, the CoC or referring agency must provide documentation to the PHA of the referring agency's verification that the family meets one of the four eligible categories for EHV assistance. The PHA must retain this documentation as part of the family's file.

TPS-IV.C. PHA SCREENING

Overview

HUD waived 24 CFR 982.552 and 982.553 in part for the EHV applicants and established alternative requirement for mandatory and permissive prohibitions of admissions. Except where applicable, PHA policies regarding denials do not apply to screening individuals and families for eligibility for an EHV. Instead, the EHV alternative requirement listed in this section will apply to all EHV applicants.

The mandatory and permissive prohibitions listed in Notice PIH 2021-15 and in this chapter, however, apply only when screening the individual or family for eligibility for an EHV. When adding a family member after the family has been placed under a HAP contract with EHV

assistance, the regulations at 24 CFR 982.551(h)(2) apply. Other than the birth, adoption, or court-awarded custody of a child, the PHA must approve additional family members and may apply its regular HCV screening criteria in doing so.

Mandatory Denials

Under alternative requirements for the EHV program, mandatory denials for EHV applicants include:

- 24 CFR 982.553(a)(1)(ii)(C), which prohibits admission if any household member has ever been convicted of drug-related criminal activity for manufacture or production of methamphetamine on the premises of federally assisted housing.

- 24 CFR 982.553(a)(2)(i), which prohibits admission to the program if any member of the household is subject to a lifetime registration requirement under a state sex offender registration program.

The PHA must deny admission to the program if any member of the family fails to sign and submit consent forms for obtaining information as required by 24 CFR 982.552(b)(3) but should notify the family of the limited EHV grounds for denial of admission first.

> THA Policy
>
> While the THA will deny admission to the program if any adult member (or head of household or spouse, regardless of age) fails to sign and submit consent forms, THA will first notify the family of the limited EHV grounds for denial of admission as part of the notice of denial that will be mailed to the family.
>
> In compliance with PIH 2021-15, THA **will not** deny an EHV applicant admission regardless of whether:
>
> > Any member of the family has been evicted from federally assisted housing in the last five years;
> >
> > A PHA has ever terminated assistance under the program for any member of the family;
> >
> > The family currently owes rent or other amounts to THA or to another PHA in connection with Section 8 or public housing assistance under the 1937 Act;
> >
> > The family has not reimbursed any PHA for amounts paid to an owner under a HAP contract for rent, damages to the unit, or other amounts owed by the family under the lease;
> >
> > The family breached an agreement with the PHA to pay amounts owed to a PHA, or amounts paid to an owner by a PHA;
> >
> > The family would otherwise be prohibited admission under alcohol abuse standards established by the PHA in accordance with 24 CFR 982.553(a)(3);
> >
> > The PHA determines that any household member is currently engaged in or has engaged in during a reasonable time before the admission, drug-related criminal activity.

TPS-IV.D. INCOME VERIFICATION AT ADMISSION

Self-Certification at Admission

The requirement to obtain third-party verification of income in accordance with Notice PIH 2018-18 does not apply to the EHV program applicants at admission, and alternatively, PHAs may consider self-certification the highest form of income verification at admission. As such, PHA policies related to the verification of income in Section 7-I.B. do not apply to EHV families at admission. Instead, applicants must submit an affidavit attesting to their reported income, assets, expenses, and other factors that would affect an income eligibility determination.

Additionally, applicants may provide third-party documentation that represents the applicant's income within the 60-day period prior to admission or voucher issuance but is not dated within 60 days of the PHA's request.

> THA Policy
>
> Any documents used for verification must be the original (not photocopies) and dated within the 60-day period prior to admission. The documents must not be damaged, altered, or in any way illegible.
>
> Printouts from webpages are considered original documents.
>
> Any family self-certifications must be made in a format acceptable to THA and must be signed by the family member whose information or status is being verified.
>
> THA will incorporate additional procedures to remind families of the obligation to provide true and complete information in accordance with Chapter 14. THA will address any material discrepancies (i.e., unreported income or a substantial difference in reported income) that may arise later. THA may, but is not required to, offer the family a repayment agreement. If the family fails to repay the excess subsidy, THA will terminate the family's assistance.

Recently Conducted Income Determinations

PHAs may accept income calculations and verifications from third-party providers or from an examination that the PHA conducted on behalf of the family for another subsidized housing program in lieu of conducting an initial examination of income as long as:

- The income was calculated in accordance with rules outlined at 24 CFR Part 5 and within the last six months; and

- The family certifies there has been no change in income or family composition in the interim.

> THA Policy
>
> THA will accept income calculations and verifications from third-party providers provided they meet the criteria outlined above.
>
> The family certification must be made in a format acceptable to THA and must be signed by all adult family members whose information or status is being verified.

At the time of the family's annual reexamination the PHA must conduct the annual

reexamination of income as outlined at 24 CFR 982.516 and PHA policies in Chapter 11.

EIV Income Validation

Once HUD makes the EIV data available to PHAs under this waiver and alternative requirement, the PHA must:

- Review the EIV Income and Income Validation Tool (IVT) reports to confirm and validate family-reported income within 90 days of the PIC submission date;

- Print and maintain copies of the EIV Income and IVT Reports in the tenant file; and

- Resolve any income discrepancy with the family within 60 days of the EIV Income or IVT Report dates.

Prior to admission, PHAs must continue to use HUD's EIV system to search for all household members using the Existing Tenant Search in accordance with PHA policies in Chapter 3.

If a PHA later determines that an ineligible family received assistance, the PHA must take steps to terminate that family from the program.

TPS-IV.E. SOCIAL SECURITY NUMBER AND CITIZENSHIP STATUS VERIFICATION

For the EHV program, the PHA is not required to obtain and verify SSN documentation and documentation evidencing eligible noncitizen status before admitting the family to the EHV program. Instead, PHAs may adopt policies to admit EHV applicants who are unable to provide the required SSN or citizenship documentation during the initial eligibility determination. As an alternative requirement, such individuals must provide the required documentation within 180 days of admission to be eligible for continued assistance, pending verification, unless the PHA provides an extension based on evidence from the family or confirmation from the CoC or other partnering agency that the family has made a good-faith effort to obtain the documentation.

If a PHA determines that an ineligible family received assistance, the PHA must take steps to terminate that family from the program.

> THA Policy
>
> THA will admit EHV applicants who are unable to provide the required SSN or citizenship documentation during the initial eligibility determination. These individuals must provide the required documentation in accordance with policies within 180 days of admission. THA may provide an additional 60-day extension based on evidence from the family or confirmation from the CoC or other partnering agency that the family has made a good-faith effort to obtain the documentation.
>
> If THA determines that an ineligible family received assistance, THA will take steps to terminate that family from the program.

TPS-IV.F. AGE AND DISABILITY VERIFICATION

PHAs may accept self-certification of date of birth and disability status if a higher level of verification is not immediately available. If self-certification is used, the PHA must obtain a higher level of verification within 90 days of admission or verify the information in EIV.

If a PHA determines that an ineligible family received assistance, the PHA must take steps to terminate that family from the program.

> <u>THA Policy</u>
>
> THA will accept self-certification of date of birth and disability status if a higher form of verification is not immediately available. The certification must be made in a format acceptable to THA and must be signed by the family member whose information or status is being verified. If self-certification is accepted, within 90 days of admission, THA will verify the information in EIV or through other third-party verification if the information is not available in EIV. THA will note the family's file that self-certification was used as initial verification and include an EIV printout or other third-party verification confirming the applicant's date of birth and/or disability status.
>
> If THA determines that an ineligible family received assistance, THA will take steps to terminate that family from the program.

PART V: HOUSING SEARCH AND LEASING

TPS-V.A. INITIAL VOUCHER TERM

Unlike the standard HCV program, which requires an initial voucher term of at least 60 days, EHV vouchers must have an initial search term of at least 120 days. PHA policies on extensions as outlined in Section 5-II.E. will apply.

> <u>THA Policy</u>
>
> All EHVs will have an initial term of 120 calendar days.
>
> The family must submit a Request for Tenancy Approval and proposed lease within the 120-day period unless THA grants an extension.

TPS-V.B. HOUSING SEARCH ASSISTANCE

The PHA must ensure housing search assistance is made available to EHV families during their initial housing search. The housing search assistance may be provided directly by the PHA or through the CoC or another partnering agency or entity.

At a minimum, housing search assistance must:

- Help individual families identify potentially available units during their housing search, including physically accessible units with features for family members with disabilities, as well as units in low-poverty neighborhoods;
- Provide transportation assistance and directions to potential units;
- Conduct owner outreach;
- Assist with the completion of rental applications and PHA forms; and
- Help expedite the EHV leasing process for the family

> <u>THA Policy</u>
>
> The MOU between THA, the CoC and Pierce County Human Services includes and

expands on the housing search assistance services outlined above.

TPS-V.C. HQS PRE-INSPECTIONS

To expedite the leasing process, PHAs may pre-inspect available units that EHV families may be interested in leasing in order to maintain a pool of eligible units.

> THA Policy
>
> To expedite the leasing process, THA may pre-inspect available units that EHV families may be interested in leasing to maintain a pool of eligible units. If an EHV family selects a unit that passed a HQS pre-inspection (without intervening occupancy) within 45 days of the date of the Request for Tenancy Approval, the unit may be approved provided that it meets all other conditions under 24 CFR 982.305.
>
> The family will be free to select his or her unit.
>
> When a pre-inspected unit is not selected, THA will make every effort to fast-track the inspection process, including adjusting the normal inspection schedule for any required re-inspections.

TPS-V.D. INITIAL LEASE TERM

Unlike in the standard the HCV program, EHV voucher holders may enter into an initial lease that is for less than 12 months, regardless of the THA Policy in Section 9-I.E., Term of Assisted Tenancy.

TPS-V.E. PORTABILITY

The normal HCV portability procedures and requirements outlined in Chapter 10 generally apply to EHVs. Exceptions are addressed below.

Nonresident Applicants

Under EHV, applicant families may move under portability even if the family did not have legal residency in the jurisdiction of the initial PHA when they applied, regardless of THA Policy in Section 10-II.B.

Billing and Absorption

A receiving PHA cannot refuse to assist an incoming EHV family, regardless of whether the PHA administers EHVs under its own ACC.

- If the EHV family moves under portability to another PHA that administers EHVs under its own ACC:
  - The receiving PHA may only absorb the incoming EHV family with an EHV (assuming it has an EHV voucher available to do so).
  - If the PHA does not have an EHV available to absorb the family, it must bill the initial PHA. The receiving PHA must allow the family to lease the unit with EHV assistance and may not absorb the family with a regular HCV when the family leases the unit.

- Regardless of whether the receiving PHA absorbs or bills the initial PHA for the family's EHV assistance, the EHV administration of the voucher is in accordance with the receiving PHA's EHV policies.

- If the EHV family moves under portability to another PHA that does not administer EHV under its own ACC, the receiving PHA may absorb the family into its regular HCV program or may bill the initial PHA.

Family Briefing

In addition to the applicable family briefing requirements at 24 CFR 982.301(a)(2) as to how portability works and how portability may affect the family's assistance, the initial PHA must inform the family how portability may impact the special EHV services and assistance that may be available to the family.

The initial PHA is required to help facilitate the family's portability move to the receiving PHA and inform the family of this requirement in writing, taking reasonable steps to ensure meaningful access for persons with limited English proficiency (LEP).

> THA Policy
>
> In addition to following THA Policy on briefings in Chapter 5, as part of the briefing packet for EHV families, THA will include a written notice that THA will assist the family with moves under portability.
>
> For limited English proficient (LEP) applicants, THA will provide interpretation services in accordance with THA's LEP plan (See Chapter 2).

Coordination of Services

If the portability move is in connection with the EHV family's initial lease-up, the receiving PHA and the initial PHA must consult and coordinate on the EHV services and assistance that will be made available to the family.

> THA Policy
>
> For EHV families who are exercising portability, when THA contacts the receiving PHA in accordance with Section 10-II.B. Preapproval Contact with Receiving PHA, THA will consult and coordinate with the receiving PHA to ensure there is no duplication of EHV services and assistance, and ensure the receiving PHA is aware of the maximum amount of services fee funding that the initial PHA may provide to the receiving PHA on behalf of the family.

Services Fee

Standard portability billing arrangements apply for HAP and ongoing administrative fees for EHV families.

For service fees funding, the amount of the service fee provided by the initial PHA may not exceed the lesser of the actual cost of the services and assistance provided to the family by the

receiving PHA or $1,750, unless the initial PHA and receiving PHA mutually agree to change the $1,750 cap. Service fees are paid as follows:

- If the receiving PHA, in consultation and coordination with the initial PHA, will provide eligible services or assistance to the incoming EHV family, the receiving PHA may be compensated for those costs by the initial PHA, regardless of whether the receiving PHA bills or absorbs.

- If the receiving PHA administers EHVs, the receiving PHA may use its own services fee and may be reimbursed by the initial PHA, or the initial PHA may provide the services funding upfront to the receiving PHA for those fees and assistance.

- If the receiving PHA does not administer EHVs, the initial PHA must provide the services funding upfront to the receiving PHA. Any amounts provided to the receiving PHA that are not used for services or assistance on behalf of the EHV family must promptly be returned by the receiving PHA to the initial PHA.

Placement Fee/Issuance Reporting Fee

If the portability lease-up qualifies for the placement fee/issuance reporting fee, the receiving PHA receives the full amount of the placement component of the placement fee/issuing reporting fee. The receiving PHA is eligible for the placement fee regardless of whether the receiving PHA bills the initial PHA or absorbs the family into its own program at initial lease-up. The initial PHA qualifies for the issuance reporting component of the placement fee/issuance reporting fee, as applicable.

TPS-V.F. PAYMENT STANDARDS

Payment Standard Schedule

For the EHV program, HUD has waived the regulation requiring a single payment standard for each unit size. Instead, the PHA may, but is not required to, establish separate higher payment standards for EHVs. Lower EHV payment standards are not permitted. If the PHA is increasing the regular HCV payment standard, the PHA must also increase the EHV payment standard if it would be otherwise lower than the new regular HCV payment standard. The separate EHV payment standard must comply with all other HCV requirements with the exception of the alternative requirements discussed below.

Further, if the PHA chooses to establish higher payments standards for EHVs, HUD has provided other regulatory waivers:

- Defining the "basic range" for payment standards as between 90 and 120 percent of the published Fair Market Rent (FMR) for the unit size (rather than 90 to 110 percent).

- Allowing a PHA that is not in a designated Small Area FMR (SAFMR) area or has not opted to voluntarily implement SAFMRs to establish exception payment standards for a ZIP code area above the basic range for the metropolitan FMR based on the HUD published SAFMRs. The PHA may establish an exception payment standard up to 120 percent (as opposed to 110 percent) of the HUD published Small Area FMR for that ZIP code area. The exception payment standard must apply to the entire ZIP code area.

- The PHA must notify HUD if it establishes an EHV exception payment standard based on the SAFMR.

THA Policy

THA will not establish a higher payment standard amount for EHVs. THA will use the same payment standards for HCV and EHV.

Rent Reasonableness

All rent reasonableness requirements apply to EHV units, regardless of whether the PHA has established an alternative or exception EHV payment standard.

Increases in Payment Standards

The requirement that the PHA apply increased payment standards at the family's first regular recertification on or after the effective date of the increase does not apply to EHV. The PHA may, but is not required to, establish an alternative policy on when to apply the increased payment standard, provided the increased payment standard is used to calculate the HAP no later than the effective date of the family's first regular reexamination following the change.

THA Policy

THA will not establish an alternative policy for increases in the payment standard. THA Policy in Section 11-III.B. governing increases in payment standards will apply to EHV.

TPS-V.G. TERMINATION OF VOUCHERS

After September 30, 2023, a PHA may not reissue EHVs when assistance for an EHV-assisted family ends. This means that when an EHV participant (a family that is receiving rental assistance under a HAP contract) leaves the program for any reason, the PHA may not reissue that EHV to another family unless it does so no later than September 30, 2023.

If an applicant family that was issued the EHV is unsuccessful in finding a unit and the EHV expires after September 30, 2023, the EHV may not be reissued to another family.

All EHVs under lease on or after October 1, 2023, may not under any circumstances be reissued to another family when the participant leaves the program for any reason.

An EHV that has never been issued to a family may be initially issued and leased after September 30, 2023, since this prohibition only applies to EHVs that are being reissued upon turnover after assistance to a family has ended. However, HUD may direct PHAs administering EHVs to cease leasing any unleased EHVs if such action is determined necessary by HUD to ensure there will be sufficient funding available to continue to cover the HAP needs of currently assisted EHV families.

Approved: September 22, 2021

_____
Stanley Rumbaugh, Chair

Resolution 5

TACOMA HOUSING AUTHORITY

RESOLUTION 2021-09-22 (5)

Date: September 22, 2021

To: THA Board of Commissioners

From: April Black
Acting Executive Director

Re: Housing Hilltop Design Build Contract - Authorization for the Housing Hilltop LLLP to Enter into Design Build contract with Walsh Construction

---

This resolution would authorize the Acting Executive Director to negotiate and execute a contract with Walsh Construction on behalf of Housing Hilltop LLLP for the construction of Housing Hilltop (the "Project").

Background

The Tacoma Housing Authority (THA) is the general partner of the Housing Hilltop LLLP. On December 12, 2018, the THA Board of Commissioners approved Resolution 2012-12-12(7) authorizing THA's Executive Director to negotiate and enter into a GC/CM contract on behalf of Housing Hilltop LLLP and Walsh Construction for the Housing Hilltop development. A predevelopment contract was signed in March 2019 but not implemented due to the exploration of a public private partnership for the Housing Hilltop Project. Once the public private partnership negotiations ceased, THA resumed predevelopment activities on the Project. The former contract was cancelled. A design build form of contract was determined by the LLLP to be best for the Project due to time and cost efficiency.

By this resolution, THA through its Acting Executive Director, acting as general partner of Housing Hilltop LLLP, seeks authorization to enter into a Design Build contract with Walsh Construction. The target hard cost construction cost is $74,000,000 for approximately 230 units of affordable housing, 30,000 sq ft of commercial space, including a 11,000 sq. ft. performing arts space for Tacoma Urban Performance Arts Center (TUPAC) and approximately 98 parking spaces and approximately $2.6 million fee for predevelopment work done by Walsh Construction. Once the exact stipulated sum is determined based on third party bids for the work, the Design Build Amendment will be executed for the exact cost of construction.

Recommendation

Approve Resolution 2021-09-22 (5) authorizing THA, through its Acting Executive Director, acting as general partner of Housing Hilltop LLLP to execute a design build contract with Walsh Construction for Housing Hilltop.

TACOMA HOUSING AUTHORITY

THA BOC RESOLUTION NO 2021-09-22 (5)
(Authorizing Hilltop Housing LLLP to enter a Design Build contract with Walsh Construction for the Housing Hilltop project)

A **RESOLUTION** of the Board of Commissioners of the Housing Authority of the City of Tacoma.

WHEREAS, The Tacoma Housing Authority (THA) is the general partner of the Housing Hilltop LLLP and by resolution 2018-12-12(7) authorized THA's Executive Director to negotiate and execute a contract on behalf of the Housing Hilltop LLLP for the Construction Manager/General Contractor for the Housing Hilltop development (the "Project"), and

WHEREAS, That resolution authorized THA. through its Executive Director, on behalf of the Housing Hilltop LLLP to negotiate and execute the preconstruction service, construction management and general contractor service, and

WHEREAS, the Housing Hilltop LLLP cancelled the contract with Walsh due to a potential opportunity for a public private partnership which failed to be consummated; and

WHEREAS, the Housing Hilltop LLLP determined that a design build contract would be more beneficial to the Project; now, therefore, be it

Resolved by the Board of Commissioners of the Housing Authority of the City of Tacoma, Washington as follows:

THA, as general partner of the Housing Hilltop LLLP, through THA's Acting Executive Director, is authorized to execute a design build contract between Housing Hilltop LLLP and Walsh Construction with a goal hard cost construction budget of $74MM and a fee of $2.6MM to Walsh for the Housing Hilltop development.

Approved: September 22, 2021

_____
Stanley Rumbaugh, Chair

Resolution 6

TACOMA HOUSING AUTHORITY

RESOLUTION 2021-09-22 (6)

Date: September 22, 2021

To: THA Board of Commissioners

From: April Black
Acting Executive Director

Re: Board Authorization for Acquisition of the Saravida Property by Condemnation or Negotiated Purchase in Lieu Thereof

---

This resolution would authorize Tacoma Housing Authority (THA) to acquire the Saravida property (the "Property") by condemnation or by negotiated purchase in lieu thereof, subject to final board approval.

Background

The Property is a former house and standalone garage that has been converted to a multitenant commercial building and related parking located at 1011, 1013, and 1015 S. L Street in Tacoma. THA owns vacant properties (currently parking lots) to the north and south of the Property. If THA acquired the Property, it would own the entire western half of the block that is bounded by S. 10th and S. 11th Streets on the north and south and by S. L Street and Martin Luther King Jr. Way on the west and east. The Property has public transit access on S. 11th Street and on Martin Luther King Jr Way and is located near People's Park. Acquiring the Property would provide many benefits to THA, including the ability to develop THA's adjoining properties in a more efficient way, resulting in more available housing units and resident services. Based on the foregoing, and subject to satisfactory due diligence work still to be performed by THA, acquisition of the Property by THA would enable THA to develop vital affordable housing in Tacoma.

Recommendation

Approve Resolution 2021-9-22 (6) authorizing THA to declare the acquisition of the Property as necessary to fulfill THA's public purpose of providing affordable housing and to direct the Executive Director of THA to acquire the Property by condemnation or by negotiated purchase in lieu thereof for an approximate sale price of $1,500,000. Notwithstanding the foregoing, approval by the Board and by the Executive Director will be required before an offer of just compensation is made pursuant to condemnation or before, in connection with a negotiated purchase in lieu of condemnation, any earnest money becomes nonrefundable to THA.

TACOMA HOUSING AUTHORITY

RESOLUTION 2021-09-22 (6)
(Acquisition of the Saravida Property)

A **RESOLUTION** of the Board of Commissioners of the Housing Authority of the City of Tacoma

WHEREAS, there is a critical shortage of modestly priced rental housing in the City of Tacoma; and

WHEREAS, the Housing Authority of the City of Tacoma ("THA" or "the Housing Authority") is charged with addressing pursuant to its mission of providing quality affordable housing opportunities equitably distributed within the City of Tacoma; and

WHEREAS, it is a goal of local government and the Housing Authority to further fair housing in the region affirmatively, in part through preservation of existing affordable housing opportunities in areas with significantly appreciating housing costs; and

WHEREAS, the Saravida property (the "Property") is located at 1011, 1013, and 1015 S. L Street, Tacoma, Washington, in an area of Tacoma where rents are increasingly unaffordable to low-income households; and

WHEREAS, the Property is strategically located between two properties already owned by THA, which properties can be better developed under common ownership; and

WHEREAS, RCW 35.82.070(2) and (5) provide, in part, that a housing authority shall have the power to acquire real property within its area of operations, including for the development of low income housing projects, and RCW 35.82.070(5) further authorizes a housing authority to acquire real property by exercise of the power of eminent domain or by purchase in lieu of exercise of the power of eminent domain; and

Whereas, acquisition of the Property by the Housing Authority will serve the mission of the Housing Authority and the housing goals of the region by maximizing the development potential of the Housing Authority's neighboring properties; now, therefore, be it

Resolved by the Board of Commissioners of the Housing Authority of the City of Tacoma, Washington as follows:

Section 1: Acquisition of the Property by the Housing Authority is necessary to provide housing for persons of low income that is equitably distributed in various areas of its operations.

Section 2: The Board of Commissioners hereby authorizes April Black, as Acting

Executive Director, or her successor as Executive Director (both, as applicable, the "Executive Director"): (i) to give notice to the current owner of the Property of the Housing Authority's intention to acquire the Property by eminent domain if it is unsuccessful in acquiring the Property on satisfactory terms through negotiation and purchase in lieu of condemnation; and (ii) subject to the terms below, to acquire the Property by condemnation through exercise of the Housing Authority's power of eminent domain, if it is unsuccessful in acquiring the Property on satisfactory terms through negotiation with and purchase from the owner in lieu of condemnation.

Section 3: The Executive Director is hereby vested with the authority, and with discretion in the exercise of such authority, to negotiate the terms of an agreement to purchase for the Property at a price of approximately One Million, Five Hundred Thousand Dollars ($1,500,000) and to pay into the purchase escrow the earnest money deposit for the purchase of the Property.

Section 4: If the Executive Director is successful in negotiating the terms of an agreement for the purchase of the Property, then the Executive Director is authorized and directed to execute the same. Following reviewing the results of inspection of the Property and other due diligence, and prior to any earnest money becoming nonrefundable to the Housing Authority, the Executive Director shall make a recommendation to the Board of Commissions as to whether to proceed with closing the purchase of the Property. If the Executive Director recommends proceeding and the Board of Commissioners approves of the same, then the Executive Director shall be authorized to take any and all actions necessary to close on the purchase of the Property on the terms approved by the Board of Commissioners.

Approved: September 22, 2021

_____
Stanley Rumbaugh, Chair

Resolution 7

TACOMA HOUSING AUTHORITY

RESOLUTION 2021-09-22 (7)

Date: September 22, 2021

To: THA Board of Commissioners

From: April Black
            Interim Executive Director

Re: Approval of THA's 2022 Moving to Work Plan

This resolution would authorize Tacoma Housing Authority's (THA) Executive Director to submit THA's 2022 Moving to Work (MTW) Plan.

Background

In accordance with its MTW agreement, THA must submit an annual MTW Plan to the Department of Housing and Urban Development (HUD). The Plan describes how THA will apply MTW in the next fiscal year, including its existing activities, any changes to existing activities, and new applications of this federal regulatory flexibility.

Each year, THA may propose new MTW activities intended to meet the statutory objectives of the MTW program:

1. Reduce costs and achieve greater cost effectiveness;
2. Increase economic independence and self-sufficiency among the families served;
3. Increase housing choices for low-income households.

MTW activities are best described as new policies or programs THA wishes to implement that require waiving HUD regulations.

2022 MTW Plan

In 2022, THA will continue to leverage its MTW flexibility to adapt our work to respond to emergent community needs. No new activities are being proposed for 2022. THA will remain focused on the following established priorities:

- Aiding in post-pandemic recovery and response
- Serving additional individuals and families
- Creating and preserving affordable housing

- Providing support and resources to our residents
- Embedding diversity, equity, and inclusion in THA's work
- Continually improving operations, programs, and services

More details and information on each of these efforts can be found in the first several pages of the appended Plan.

While no new activities are being proposed, THA is making some revisions to its existing ones. THA's Department of Client Support and Empowerment is considering changes to the Family Self-Sufficiency program that may impact program eligibility, the Contract of Participation length, pay points, and types of services rendered by staff. Additionally, THA is proposing a couple of additional flexibilities under its Modify Housing Quality Standards (HQS) activity including allowing self-certification for initial inspections for THA-owned units and pre-inspections for units that previously housed a voucher holder and/or for units owned by landlords that express interest in renting to a voucher holder. Finally, depending on the findings of the internal Housing Opportunity Program (HOP) evaluation, THA is informing HUD that subsequent activity modifications could follow.

Beyond these program and policy revisions that aim to ease program administration and improve client outcomes, there are no significant changes in the 2022 MTW Plan.

Recommendation

Approve Resolution 2021-09-22 (7) authorizing the Executive Director to submit the Housing Authority of the City of Tacoma's Fiscal Year 2022 Moving to Work (MTW) Plan.

TACOMA HOUSING AUTHORITY

RESOLUTION 2021-09-22 (7)
Certifications of Compliance

Annual Moving to Work Plan Certifications of Compliance
U.S. Department of Housing and Urban Development
Office of Public and Indian Housing

Certifications of Compliance with Regulations: Board Resolution to Accompany the
Annual Moving to Work Plan

Begins on next page.

CERTIFICATIONS OF COMPLIANCE

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
OFFICE OF PUBLIC AND INDIAN HOUSING

Certifications of Compliance with Regulations:
Board Resolution to Accompany the Annual Moving to Work Plan

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chair or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the Annual Moving to Work Plan for the MTW PHA Plan Year beginning (DD/MM/YYYY), hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

(1) The MTW PHA published a notice that a hearing would be held, that the Plan and all information relevant to the public hearing was available for public inspection for at least 30 days, that there were no less than 15 days between the public hearing and the approval of the Plan by the Board of Commissioners, and that the MTW PHA conducted a public hearing to discuss the Plan and invited public comment.

(2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board or Boards) before approval of the Plan by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the Annual MTW Plan.

(3) The MTW PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1 (or successor form as required by HUD).

(4) The MTW PHA will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.

(5) The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.

(6) The Plan contains a certification by the appropriate state or local officials that the Plan is consistent with the applicable Consolidated Plan.

(7) The MTW PHA will affirmatively further fair housing by fulfilling the requirements set out in HUD regulations found at Title 24 of the Code of Federal Regulations, including regulations in place at the time of this certification, and any subsequently promulgated regulations governing the obligation to affirmatively further fair housing. The MTW PHA is always responsible for understanding and implementing the requirements of HUD regulations and policies, and has a continuing obligation to affirmatively further fair housing in compliance with the 1968 Fair Housing Act, the Housing and Community Development Act of 1974, The Cranston-Gonzalez National Affordable Housing Act, and the Quality Housing and Work Responsibility Act of 1998. (42 U.S.C. 3608, 5304(b)(2), 5306(d)(7)(B), 12705(b)(15), and 1437C–1(d)(16)). The MTW PHA will affirmatively further fair housing by fulfilling the requirements at 24 CFR 903.7(o) and 24 CFR 903.15, which means that it will take meaningful actions to further the goals identified in its Analysis of Impediments to Fair Housing Choice(AI),Assessment of Fair Housing (AFH), and/or other fair housing planning documents conducted in accordance with the requirements of 24 CFR Part 5, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o), and will address impediments to fair housing choice identified in its AI, AFH, and/or other fair housing planning documents associated with any applicable Consolidated or Annual Action Plan under 24 CFR Part 91.

(8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975 and HUD's implementing regulations at 24 C.F.R. Part 146.

(9) In accordance with 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender identity, or marital status.

(10) The MTW PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.

(11) The MTW PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 75.

(12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.

(13) The MTW PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment and implementing regulations at 49 CFR Part 24.

(14) The MTW PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.

(15) The MTW PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).

(16) The MTW PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the MTW PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.

(17) With respect to public housing and applicable local, non-traditional development the MTW PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.

(18) The MTW PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.

(19) The MTW PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.

(20) The MTW PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 225 (Cost Principles for State, Local and Indian Tribal Governments) and 2 CFR Part 200.

(21) The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of Housing Quality Standards, as defined in 24 CFR Part 982 or as approved by HUD, for any Housing Choice Voucher units under administration.

(22) The MTW PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the Moving to Work Agreement and Statement of Authorizations and included in its Plan.

(23) All attachments to the Plan have been and will continue to be available at all times and all locations that the Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the MTW PHA in its Plan and will continue to be made available at least at the primary business office of the MTW PHA.

Housing Authority of the City of Tacoma   WA005

_____   _____
MTW PHA NAME   ***MTW PHA NUMBER/HA CODE***

I/We, the undersigned, certify under penalty of perjury that the information provided above is true and correct. WARNING: Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§ 287, 1001, 1010, 1012; 31 U.S.C. §3729, 3802).

Stanley Rumbaugh   Chairperson

_____   _____
NAME OF AUTHORIZED OFFICIAL   ***TITLE***

                                                       September 22, 2021

_____   _____
SIGNATURE   ***DATE***

*   *Must be signed by either the Chair or Secretary of the Board of the MTW PHA's legislative body. This certification cannot be signed by an employee unless authorized by the MTW PHA Board to do so. If this document is not signed by the Chair or Secretary, documentation such as the by-laws or authorizing board resolution must accompany this certification.*

TABLE OF CONTENTS

Section I: Introduction

As the Tacoma Housing Authority (THA) continues to respond to the COVID-19 pandemic and the resulting economic fallout, we will undoubtedly rely on our Moving to Work (MTW) flexibility to continually improvise and respond to emergent community needs. In addition to response and recovery, we are doubling down on our social justice mission to ensure our efforts are delivering equitable outcomes for the people we serve and the broader Tacoma community.

Prior to the pandemic, the housing market struggled to keep pace with the growing need and now, even more so. A housing shortage, in-migration of higher wage earners, and gentrification continue to create an untenable situation for people with low incomes. THA will continue to address this issue through its real estate development strategies, including the construction and acquisition of affordable housing units. In partnership with the Hilltop community, THA recently adopted a community framework to guide the development plan which calls for the eventual construction of over 200 units of housing. In addition to development, we also continue to seek out and disburse new voucher subsidies as they become available. A large focus this next year will be the lease-up of THA's 135 Emergency Housing Vouchers (EHVs), which serve individuals and families who are living homeless or experiencing housing instability.

Leveraging our MTW flexibility and in partnership with local providers, THA will continue to deliver unique subsidy programs that meet the needs of diverse individuals and families, including Tacoma Public School students experiencing homelessness and their families; college students who are housing insecure and homeless; individuals exiting the criminal justice system; and child welfare system-involved youth and families. We will continue to closely monitor program outcomes to ensure these strategies are responsive to and keeping pace with the rapidly changing context within which they operate.

Finally, THA, like other organizations, is considering how to simultaneously operate in a stressful and unpredictable environment while ensuring sustainability in our staff and systems. Over this next year, we will invest in strengthening and supporting our processes, systems, and staff.

While the pandemic continues to highlight systemic inequities across health, economic, educational, and housing outcomes, THA will seek ways to address these challenges over the long-term while being responsive to the imminent health, safety, and well-being of the community we serve. Moving to Work is essential in our ability to advance long-term strategies while remaining nimble and responsive in times of emergency, such as the one we continue to find ourselves in.

LONG-TERM GOALS & OBJECTIVES

THA's Board of Commissioners has chosen the agency's seven strategic objectives, each with performance measures that guide the agency over the long-term. We summarize them on the following pages and provide full detail in Appendix C: THA's Strategic Objectives with Performance Measures.

These strategic objectives advance our mission to provide high-quality housing and supportive services to people with low incomes, with a focus on those facing the greatest marginalization. We strive to do this in ways that accomplish two other aims. **First**, we seek to help people succeed, not just as residents but also, as our vision statement and strategic objectives contemplate, as "parents, students, wage earners and builders of assets". **Second**, we seek to help the City of Tacoma develop equitable affordable housing opportunities. We aim to help build a Tacoma that is a place that households of all incomes, races, and compositions, as our mission statement contemplates, experience as "safe, vibrant, prosperous, attractive, and just." The following seven strategic objectives are ambitious. THA will require all the tools within reach, including its MTW flexibility.

1. **Housing and Supportive Services**
   THA will provide high quality housing, rental assistance and supportive services. Its supportive services will help people as residents, parents, students, wage earners, and builders of assets who can live without assistance. It will focus this assistance to meet the greatest need.

2. **Housing and Real Estate Development**
   THA will efficiently develop housing and properties that serve primarily families and individuals unable to find affordable and supporting housing they need. Its work will serve to promote the community's development. Its properties will be financially sustainable, environmentally innovative, and attractive.

3. **Property Management**
   THA will manage its properties so they are safe, efficient to operate, good neighbors, attractive assets to their neighborhoods and places where people want to live.

4. **Financially Sustainable Operations**
   THA seeks to be more financially sustaining.

5. **Environmental Responsibility**

   THA will develop and operate its properties in a way that preserves and protects natural resources.

6. **Advocacy and Public Education**

   THA will advocate for the value of THA's work and for the interests of the people it serves. It will be a resource for high quality advice, data, and information on housing, community development, and related topics. THA will do this work at the local, state and national level.

7. **Administration**

   THA will have excellent administrative systems. Its staff will have skills that make THA highly efficient and effective in the customer service it provides to the public and among its departments. It will provide a workplace that attracts, develops and retains motivated and talented employees.

SHORT-TERM GOALS & OBJECTIVES

The pandemic is requiring us to continually relearn and adjust the ways we do our work. That work includes managing a large and varied portfolio of properties that houses marginalized households; paying rent on behalf of thousands of voucher holders to hundreds of landlords; completing large, complicated real estate projects; and providing supportive services to an increasingly stressed population of clients.

In 2022, THA will continue to adapt our work to respond to the community's needs while leveraging MTW flexibility to:

Aid in Post-Pandemic Response and Recovery
As of the writing of this Plan, COVID-19 case rates began climbing again after a brief respite from local vaccination efforts. We anticipate that we will continue to adapt, adjust, and respond to resident and community needs as they arise throughout 2022. A large focus will be on ensuring THA residents and the broader community of low-income households have access to resources recently made available through the American Rescue Plan Act. We will continue to closely partner with Pierce County and the Continuum of Care to lease-up the 135 Emergency Housing Vouchers dedicated to households who are homeless or facing housing instability.

Serve Additional Individuals and Families
THA will continue to seek out every resource and opportunity to serve more households, particularly those facing multiple barriers to housing. We will continue our partnership with Pierce County's Department of Human Services to help fund the county's rapid rehousing program for families with young children and young adults experiencing homelessness. With our Moving to Work flexibility, we have been able to design unique subsidy programs that serve households facing multiple barriers such as community college students experiencing homelessness, Tacoma Public School students who are homeless and their families, and youth and families involved in the child welfare system. This work will continue into 2022 as we consider additional strategies and partnerships that address the local homelessness crisis.

Create and Preserve Affordable Housing
Tacoma's rental market continues to grow more expensive and inaccessible to low-income households. Our voucher subsidy struggles to keep pace with the rising rents. Our clients must compete for fewer vacancies with other households that have stronger credit and rental histories. In response, THA is building, buying, and rebuilding properties that we then keep permanently affordable for people with low incomes. This next year, we will continue work on several development projects, of which a couple are highlighted below:

- **Housing Hilltop:** Hilltop, a historically Black/African-American neighborhood, is undergoing rapid transition and growth with increasing

private development interests and a forthcoming light rail line. Housing Hilltop is a development partnership with the Hilltop community to preserve and develop affordable housing, retail, and community spaces for the neighborhood. This multi-phase project will result in the redevelopment of four parcels into mixed-use affordable housing that is responsive to the needs and aspirations of the Hilltop community.

- **Hillsdale Heights:** THA will continue its partnership with Bridge Meadows to explore the feasibility of developing two independent housing developments at our Hillsdale Heights property. Specifically, we are exploring if THA could develop 60-70 affordable housing units for families on half of the parcel and sell the remaining half to Bridge Meadows for the development of an intergenerational community serving families with foster children and seniors.

In addition to development, THA will continue to actively pursue acquisition opportunities as they become available.

Provide Support and Resources to Our Residents

Amid ongoing uncertainty associated with the pandemic, THA will continue to focus on building partnerships and uncovering resources to provide THA residents with the supports and services they need to stay stably housed and pursue their aspirations and goals. While the world oscillates among degrees of "reopening", we know that residents will continue to face uncertainty. THA will continue to balance being responsive to immediate needs while supporting residents in making progress towards their longer-term goals. To that end, THA's Client Support and Empowerment Department will continue the redesign and implementation of its Family Self-Sufficiency (FSS) program. The goal is to develop an attractive and equitable program that centers the whole family. In line with this aim, THA will continue to support families with children in middle school and/or high school by providing targeted resources, programming, and staff support to children *and* adults in the household through the recently implemented Two Generational Program (2Gen). Finally, we will continue to offer the recently redesigned Children's Savings Account (CSA) program that provides a $500 contribution when a student opens a GET 529 prepaid college tuition account and ongoing services, support, and education to help the student and family meet their long-term educational and career goals.

Embed Diversity, Equity, and Inclusion in THA's Work

While THA has always seen itself as a social justice agency with a technical mission, we know that there is always work to do to advance diversity, equity, and inclusion (DEI). In recent years, THA has taken concrete steps to advance these values: forming a dedicated project to give special attention to review and adjust ways THA can be effectively diverse, inclusive, and equitable in three areas: as a workplace for staff, its programs to clients, and its role in the civic discussion of the city, state, and nation; creating a Board-led Diversity, Equity, and Inclusion Committee to help further THA's DEI work with an initial focus of helping to align Board and staff goals and strategies; and holding internal staff-led discussions that explored how THA should approach these objectives. In 2022, we will double down on these efforts by moving from committee work to a THA-

wide discussion that will prioritize DEI at the agency. We will enlist the support of a consultant to conduct an initial assessment that will help establish a concrete plan for THA's DEI work moving forward.

Continually Improve Operations, Programs, and Services

As we continue to respond to the pandemic and its impacts, we will streamline and adapt our operations, programs, and services to better meet resident needs, ease the administration of THA's housing programs, and improve our operational systems. In 2022, THA will continue assessing its current IT software platform and explore other options that could benefit THA operations, customer service, oversight, and reporting. THA seeks a comprehensive tool that connects the organization and better manages data, enabling us to make data-driven decisions and continually improve operations and programs. We will also continue to closely monitor and evaluate the outcomes of our time-limited, fixed rental subsidy programs. The increasingly expensive and out of reach housing market coupled with the devastating economic impacts of the pandemic, particularly on historically marginalized populations, require THA to assess the effectiveness of these programs in addressing the needs of the individuals and families we serve. Program modifications could follow this analysis.

Section II: General THA Operating Information

HOUSING STOCK INFORMATION

Planned New Public Housing Units

New public housing units that the MTW PHA anticipates will be added during the Plan Year

ASSET MANAGEMENT PROJECT (AMP) NAME AND NUMBER	BEDROOM SIZE						TOTAL UNITS	POPULATION TYPE*	# of Uniform Federal Accessibility Standards (UFAS) Units	
	0/1	2	3	4	5	6+			Fully Accessible	Adaptable
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Total Public Housing Units to be Added in the Plan Year   **N/A**

Planned Public Housing Units to be Removed

Public housing units that the MTW PHA anticipates will be removed during the Plan Year

AMP NAME AND NUMBER	NUMBER OF UNITS TO BE REMOVED	EXPLANATION FOR REMOVAL
N/A	0	N/A
	0	

Planned New Project Based Vouchers

Tenant-based vouchers that the MTW PHA anticipates project-basing for the first time during the Plan Year. These include only those in which at least an Agreement to enter into a Housing Assistance Payment (AHAP) will be in place by the end of the Plan Year. Indicate whether the unit is included in the Rental Assistance Demonstration (RAD).

PROPERTY NAME	# of PBV	RAD?	DESCRIPTION OF PROJECT
N/A	N/A	N/A	N/A

N/A	**Planned Total Vouchers to be Newly Project-Based**

Planned Existing Project Based Vouchers

Tenant-based vouchers that the MTW PHA is currently project-basing in the Plan Year. These include only those in which at least an AHAP is already in place at the beginning of the Plan Year. Indicate whether the unit is included in RAD.

PROPERTY NAME	# of PBV	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
Arlington Youth Drive	58	Leased/Issued	No	Youth and Young Adult Housing
Bay Terrace 1	20	Leased/Issued	No	THA Family Housing
Bay Terrace 2	52	Leased/Issued	No	THA Family Housing
Bay Terrace – RAD	26	Leased/Issued	Yes	THA Family Housing
Eliza McCabe Townhomes	10	Leased/Issued	No	Mercy Housing Family Housing
Flett Meadows	13	Leased/Issued	No	LASA Family Housing
Guadalupe Vista	38	Leased/Issued	No	CCSWW Family Housing
Harborview Manor	147	Leased/Issued	No	Affordable Senior Housing
Hillside Gardens	8	Leased/Issued	No	THA Family Housing
Hillside Terrace 1500	12	Leased/Issued	No	THA Family Housing
Hillside RAD	33	Leased/Issued	Yes	THA Family Housing
Hillside 2	13	Leased/Issued	No	THA Family Housing
Hilltop Lofts	57	Committed	No	Permanent Supportive Housing

PROPERTY NAME	# of PBV	PLANNED STATUS AT END OF PLAN YEAR*	RAD?	DESCRIPTION OF PROJECT
Home at Last	30	Leased/Issued	No	YWCA Family Housing
Nativity House	50	Leased/Issued	No	CCSWW Permanent Supportive Housing for adults
New Tacoma Phase 2	8	Leased/Issued	No	Senior housing
Olympus Apts.	18	Leased/Issued	No	KWA affordable housing units at 60% AMI or below
Pacific Courtyards	23	Leased/Issued	No	MDC transitional family housing
Rialto Apts.	52	Leased/Issued	No	PHS affordable housing units at 50% AMI or below
Salishan 1-7[1]	340	Leased/Issued	No	THA Family Housing
Salishan RAD	290	Leased/Issued	Yes	THA Family Housing
The Rise at 19th	64	Leased/Issued	No	THA Family housing
Tyler Square	15	Leased/Issued	No	TRM Family Housing
Renew Tacoma Housing	456	Leased/Issued	Yes	THA Senior/Disabled Housing
	1,833	**Planned Total Existing Project-Based Vouchers**		

---

1 Please note: Salishan 7 never had public housing units and will not be found in PIC

Planned Other Changes to MTW Housing Stock Anticipated During the Plan Year

Examples of the types of other changes can include (but are not limited to): units held off-line due to relocation or substantial rehabilitation, local, non-traditional units to be acquired/developed, etc.

PLANNED OTHER CHANGES TO MTW HOUSING STOCK ANTICIPATED IN THE PLAN YEAR
THA will acquire existing housing in the market to preserve affordable housing to households earning up to 80% of the area median income (AMI).
THA has sold the last seven lots in Area 2B of Salishan. These lots were planned to be developed into market rate rentals. THA received an offer to purchase the lots by a small, minority owned Tacoma based firm. They will be developing 18 market-rate rental units.
THA is in discussion with Tacoma Public Schools for acquisition or other possible options for the Gault School site. This includes a role THA may play if the school is demolished and the park across the street is taken out of consideration for development.
THA completed its RAD conversion of Salishan and Hillside properties in 2019.   The disposition of its scattered site public housing through Section 32 has also been completed, except for one remaining unit. This unit is being leased to a large family. This will leave THA with 719 public housing units available for use under Faircloth. THA is considering placing Public Housing Faircloth units in new acquisitions and new developments and eventually converting these units to RAD.

General Description of All Planned Capital Expenditures During the Plan Year

Narrative general description of all planned capital expenditures of MTW funds during the Plan Year.

GENERAL DESCRIPTION OF ALL PLANNED CAPITAL EXPENDITURES DURING THE PLAN YEAR
In 2019, THA converted all but 5 units under the RAD. THA does not intend to close its PH ACC and will keep it open for the purpose of developing new PH units. THA will receive minimal Capital funds in 2022, yet has funds carried over from 2021 that will be reflected in the budget and will transfer to Operations.

LEASING INFORMATION

Planned Number of Households Served

Snapshot and unit month information on the number of households the MTW PHA plans to serve at the end of the Plan Year.

PLANNED NUMBER OF HOUSEHOLDS SERVED THROUGH:	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED*	PLANNED NUMBER OF HOUSEHOLDS TO BE SERVED**
MTW Public Housing Units Leased	48	4
MTW Housing Choice Vouchers (HCV) Utilized	49,574	4,131
Local, Non-Traditional: Tenant-Based^	1,750[2]	146
Local, Non-Traditional: Property-Based^	4,099	342
Local, Non-Traditional: Homeownership^	0	0

Planned Total Households Served	**55,471**	**4,623**

* "Planned Number of Unit Months Occupied/Leased" is the total number of months the MTW PHA plans to have leased/occupied in each category throughout the full Plan Year.

** "Planned Number of Households to be Served" is calculated by dividing the "Planned Number of Unit Months Occupied/Leased" by the number of months in the Plan Year.

---

2 Under HUD approval, THA includes LNT: Tenant-Based households six months post-participation. See Activity 15 for further details.

^ In instances when a local, non-traditional program provides a certain subsidy level but does not specify a number of units/households to be served, the MTW PHA should estimate the number of households to be served.

LOCAL, NON-TRADITIONAL CATEGORY	MTW ACTIVITY NAME/NUMBER	PLANNED NUMBER OF UNIT MONTHS OCCUPIED/LEASED*	PLANNED NUMBER OF HOUSEHOLDS TO BE SERVED*
Tenant-Based	Regional Approach for Special Purpose Housing/15	1,750	146
Property-Based	Creation & Preservation of Affordable Housing/16	4,099	342
Homeownership	N/A	0	0

* The sum of the figures provided should match the totals provided for each local, non-traditional category in the previous table. Figures should be given by individual activity. Multiple entries may be made for each category if applicable.

Discussion of Any Anticipated Issues/Possible Solutions Related to Leasing

Discussions of any anticipated issues and solutions in the MTW housing programs listed.

HOUSING PROGRAM	DESCRIPTION OF ANTICIPATED LEASING ISSUES AND POSSIBLE SOLUTIONS
MTW Housing Choice Voucher/Portfolio	Although the pandemic created uncertainty and operational challenges, THA's Portfolio maintained a 99% lease-up rate throughout 2020 and 2021. We anticipate this trend to continue in 2022. At this time, THA does not plan to issue new HOP vouchers but will continue to focus on identifying households from the Consolidated Waitlist and the Over/Under Housed Transfer Waitlist to fill units at the Rise. Subsequently, THA will also focus on backfilling units as transfer households move out. THA is reviewing its transfer waitlist policies to streamline operations and ensure equity for applicants on the Consolidated Waitlist and households waiting for transfers. Finally, THA is piloting a Housing Navigator program for THA programs serving voucher households who face greater barriers on the private housing market.
Local, Non-Traditional	THA currently invests in two local non-traditional housing programs that are administered through Pierce County. The county is responsible for allocating THA's investment to local rapid rehousing providers. Depending on the capacity of county and local providers to utilize and allocate these funds, there may be issues related to fully utilizing the allocated amount. THA will work closely with Pierce County to monitor the contract amount and the number of households served and will respond accordingly.

WAITING LIST INFORMATION

Snapshot information of waiting list data as anticipated at the beginning of the Plan Year. The "Description" column should detail the structure of the waiting list and the population(s) served.

WAITING LIST NAME	DESCRIPTION	NUMBER OF HOUSEHOLDS ON WAITING LIST	WAITING LIST OPEN, PARTIALLY OPEN OR CLOSED	PLANS TO OPEN THE WAITING LIST DURING THE PLAN YEAR
THA Consolidated Waitlist	Other/ Consolidated waitlist for THA voucher programs and THA site-based waiting list	1,556	Closed	No

Please describe any duplication of applicants across waiting lists:

N/A

Planned Changes to Waiting List in the Plan Year

Please describe any anticipated changes to the organizational structure or policies of the waiting list(s), including any opening or closing of a waiting list, during the Plan Year.

WAITING LIST NAME	DESCRIPTION OF PLANNED CHANGES TO WAITING LIST
THA Consolidated Waitlist	THA does not anticipate making any changes to the waiting list in 2022.

Section III. Proposed MTW Activities

N/A

Section IV. Approved MTW Activities

IMPLEMENTED

1. Extend Allowable Tenant Absences From Unit For Active Duty Soldiers

Plan Year Approved, Implemented, Amended: THA proposed and implemented this activity in 2011.

Description: THA modified its policy for terminating households who were absent from their unit for more than 180 days. THA's programs have a number of reserve or guard military families because of close proximity to Fort Lewis, one of the nation's largest military bases. Active duty may force a household to be absent from their assisted unit for more than 180 days, the amount of time the normal rules allow, leaving them without housing assistance when the service member returns home. Although the question of having to terminate such a household of service men and women arose only a few times during the Iraq war, the prospect of terminating them was too unsettling even to risk. This activity enabled THA to allow a previously assisted households returning from deployment to request reinstatement within 90 days from the date they return from deployment.

Planned Non-Significant Changes: THA does not anticipate any changes to this activity during the Plan year.

Planned Changes to Metrics/Data Collection: THA does not anticipate any modifications to the baselines or benchmarks during the plan year.

Planned Significant Changes: THA does not anticipate any significant changes to this activity during the Plan year.

3. Local Project-Based Voucher Program

Plan Year Approved, Implemented, Amended: THA proposed this activity in 2011 and it has been completely implemented.

Description: This program introduced several changes to the way THA operates the project-based voucher program. They are as follows:

- **Remove 20% cap on project-based vouchers for THA developments**
  Traditionally, HUD mandates that PHAs not spend more than twenty (20) percent of their Annual Budget Authority (ABA) toward Project Based Vouchers. THA received permission through MTW to go above this threshold toward PBVs in projects owned and operated by the agency, allowing us to finance more developments in the future.

- **Established a reasonable competitive process and contract terms for PBV assistance**
  THA established a reasonable competitive process and contract terms, including the length of the contract, for project-basing HCV assistance at units owned by for-profit or non-profit entities. Units must meet existing HQS or any standard developed by THA and approved by HUD pursuant to the requirements of this Restated Agreement.

- **In-house Housing Quality Standards (HQS) inspections**
  THA began conducting Housing Quality Standards (HQS) inspections on units it owns or has interest in.

- **Modified Choice Mobility options for non-RAD, PBV households**
  THA initially used this activity to waive the mobility option that allowed PBV tenants to automatically receive a tenant-based voucher after one year of occupancy. Once THA converted a majority of its PBV units to RAD-PBV, THA revised its Choice Mobility policies. The RAD rules require THA to offer Choice Mobility vouchers to RAD-PBV tenants. In 2017, THA's board approved a revised version of this policy that made Choice Mobility available to *all* PBV tenants – given that certain criteria were met. PBV households that wish to exercise Choice Mobility must meet the following requirements: 1) in good status/no debts owed; 2) one-time use policy 3) receive pre-issuance counseling; 4) unpaid tenant charges that could result in termination of voucher assistance. THA grandfathered in anyone who had a PBV before October 1, 2011.

- **Streamline PBV program**

  In 2018, THA modified the activity by waiving the per project cap on a case-by-case basis for projects, including those not owned by THA; and allowing individual project owners to manage their own waiting lists. The changes have allowed THA to streamline many parts of the project-based program that were inefficient or unfair to those on the waitlist.

- **Emergency Operations**

  In 2021, HUD approved a proposal that allows THA to adjust operations and policies, as needed, during times of declared emergencies. See Appendix D: THA's Emergency Operations. During the COVID pandemic, HUD waived certain program requirements and rules that helped public housing authorities respond to the pandemic. Using MTW flexibility, THA has adopted similar waivers for future use during times of emergency that would significantly disrupt daily operations for THA staff and residents, clients, and applicants.

Planned Non-Significant Changes: THA does not anticipate any changes to this activity during the plan year.

Planned Changes to Metrics/Data Collection: THA does not anticipate any modifications to the baselines or benchmarks during the plan year.

Planned Significant Changes: THA does not anticipate any significant changes to this activity in the Plan year.

5. Local Policies for Fixed-Income Households

Plan Year Approved, Implemented, Amended: THA received authorization for this activity in 2011 and it was fully implemented in 2013.

Description: This activity is for households in which all adult members are either elderly and/or disabled and at least 90% of total household income comes from a fixed source such as social security, SSI or a pension. For these households this activity includes the following:

- Annual recertifications are completed on a triennial schedule.
- Eliminated the elderly/disabled deduction.
- Eliminated the dependent deduction.
- Eliminate medical deductions below $2500.
- Implement 28.5% TTP to help offset the elimination in elderly/disabled deduction and simplification of medical expense allowances.
- Implement a tiered rent model based on adjusted income bands.
- Implement local verification policies as outlined in Activity 7.
- Implement a minimum rent of $25 (and therefore eliminate utility allowance reimbursements).

THA's hardship policy for MTW-HCV households states that households may submit a written request for a hardship exemption if they are paying the minimum rent but are no longer able to do so due to financial hardship. For MTW elderly/disabled households they must meet one of the following requirements: (1) income changes will require household to pay more than 40% of their income as rent; or (2) household has zero income. THA's hardship policy also required households to obtain third-party documentation to show that they had applied for other hardship programs. THA recognized that this was an unnecessary burden for households and made it extremely difficult for those who income-qualified for a hardship to receive one. In 2020, THA revised its hardship policy to remove the third-party documentation requirements to make it easier and less burdensome for households to apply for hardship.

During the COVID pandemic, HUD waived certain program requirements and rules that helped public housing authorities respond to the pandemic. Using MTW flexibility, THA has adopted similar waivers for future use during times of emergency that would significantly disrupt daily operations for THA staff, residents, clients, and applicants. In 2021, HUD approved changes that will allow THA to implement policy changes as needed during times of declared emergencies. See Appendix D: THA's Emergency Operations.

Planned Non-Significant Changes: THA does not anticipate any changes to this activity during the plan year.

Planned Changes to Metrics/Data Collection: THA does not anticipate any modifications to the baselines or benchmarks during the plan year.

Planned Significant Changes: THA does not anticipate any significant changes to this activity in the Plan year.

6. Local Policies for Work-Able Households

Plan Year Approved, Implemented, Amended: THA received authorization for this activity in 2011 and it was fully implemented in 2013.

Description: THA used this activity to implement rent reform for work-able households. Under this plan work-able households are subject to the following rent policy:

- Complete recertification reviews once every 2 years instead of every year (biennial recertifications) with no "off-year" COLA-related rent adjustments unless interim is triggered;
- Eliminate dependent deduction;
- Eliminate medical deductions below $2500 and implement bands;
- Implement 28.5% TTP to help offset the dependent deduction;
- Implement a tiered rent model based on adjusted income bands;
- Implement local verification policies as outlined in Activity 7;
- Implement minimum rent of $75 (and therefore eliminate utility allowance reimbursements).

This above rent policy allows THA to streamline the process of rent calculations and annual reviews. THA has made changes to forms and documents in order to administer the rent reform program successfully and continues to see staff time and cost savings because of the biennial review schedule.

THA's hardship policy for MTW-HCV households states that households may request in writing a hardship exemption if they are paying the minimum rent but are no longer able to do so due to financial hardship. For MTW work-able households they must meet one of the following requirements: (1) income changes will require household to pay more than 50% of their income as rent; or (2) household has zero income. THA also requires that MTW work-able households show that they have applied for unemployment. THA's hardship policy previously required households to obtain third-party documentation to show that they had applied for other hardship programs. THA recognized that this was an unnecessary burden for households and made it extremely difficult for households who income-qualified for a hardship to receive one. THA removed this verification requirement.

During the COVID pandemic, HUD waived certain program requirements and rules that helped public housing authorities respond to the pandemic. Using MTW flexibility, THA has adopted similar waivers for future use during times of emergency that would significantly disrupt daily operations

for THA staff, residents, clients, and applicants. In 2021, HUD approved changes that will allow THA to implement policy changes as needed during times of declared emergencies. See Appendix D: THA's Emergency Operations.

Planned Non-Significant Changes: THA does not anticipate any non-significant changes to metrics or data collection during the plan year.

Planned Changes to Metrics/Data Collection: THA does not anticipate any modifications to the baselines or benchmarks during the Plan year.

Planned Significant Changes: THA does not anticipate any significant changes to this activity in the Plan year.

7. Local Income and Asset Verification Policy

Plan Year Approved, Implemented, Amended: THA proposed and implemented this activity in 2011.

Description: As part of this activity THA implemented the following policies:

- Allow tenants to self-certify assets valued at less than $25,000.
- Disregard income from assets valued at less than $25,000.
- Eliminate earned income disallowance (EID).
- Exclude resident stipends up to $500.
- Accept hand-carried third-party verifications and increase number of days verifications are valid up to 180 days.
- Extend the authorization of the HUD 9886 form.
- Accept hand carried verifications.

These changes allowed THA to further streamline inefficient processes and save both staff time while reducing the burden on clients to provide information that made little difference in rent calculation.

During the COVID pandemic, HUD waived certain program requirements and rules that helped public housing authorities respond to the pandemic. Using MTW flexibility, THA has adopted similar waivers for future use during times of emergency that would significantly disrupt daily operations for THA staff, residents, clients, and applicants. In 2021, HUD approved changes that will allow THA to implement policy changes as needed during times of declared emergencies. See Appendix D: THA's Emergency Operations.

Planned Non-Significant Changes: THA does not anticipate any changes to this activity during the Plan year.

Planned Changes to Metrics/Data Collection: THA does not anticipate any modifications to the baselines or benchmarks during the Plan year.

Planned Significant Changes: THA does not anticipate additional authorizations for this activity during the Plan year.

8. Local Interim Processing and Verification Policies (HCV/PH)

Plan Year Approved, Implemented, Amended: THA proposed and implemented this activity in 2011.

Description: The purpose of this activity is to streamline the interim review process. THA found that parts of its interim policy were causing more work than necessary. Because of that, THA will no longer require an interim increase for every income increase reported and will process interim decreases when the income loss is 20% or more. THA will also limit interims to two per recertification cycle. In 2013, a process improvement project led to THA accepting all interims online. The activity has worked well with THA providing supports to clients who cannot use a computer and need assistance.

During the COVID pandemic, HUD waived certain program requirements and rules that helped public housing authorities respond to the pandemic. Using MTW flexibility, THA has adopted similar waivers for future use during times of emergency that would significantly disrupt daily operations for THA staff, residents, clients, and applicants. In 2021, HUD approved changes that will allow THA to implement policy changes as needed during times of declared emergencies. See Appendix D: THA's Emergency Operations.

Planned Non-Significant Changes: THA does not anticipate any modifications to the baselines or benchmarks during the Plan year.

Planned Changes to Metrics/Data Collection: THA does not anticipate any modifications to the baselines or benchmarks during the Plan year.

Planned Significant Changes: THA does not anticipate additional authorizations for this activity during the Plan year.

11. Simplified Utility Allowance

Plan Year Approved, Implemented, Amended: THA proposed and implemented this activity in 2011.

Description: This activity streamlined the utility allowance (UA) given to THA's clients and residents. Historically, THA's utility allowances varied by building type, bedroom size, and type of fuel/energy used. These variables resulted in numerous possible utility allowance combinations that were difficult to explain to property owners and clients, and often resulted in methodological misunderstandings. The new UA schedule was streamlined by eliminating the structure and energy type differentiators.

The Housing Authority has calculated the average utility allowance currently provided to housing choice voucher and public housing program participants, and revised allowances. The revision provides each household responsible for tenant supplied utilities with the average allowance based upon unit bedroom size. Households have a more simplified explanation of utility allowance benefits and the Housing Authority staff now selects an allowance based only on unit size instead of determining individual allowances for every unit leased.

Planned Non-Significant Changes: THA does not anticipate any changes to this activity during the Plan year.

Planned Changes to Metrics/Data Collection: THA does not anticipate any modifications to the baselines or benchmarks during the Plan year.

Planned Significant Changes: THA does not anticipate additional authorizations for this activity during the Plan year.

12. Local Port-Out Policy

Plan Year Approved, Implemented, Amended: THA proposed and implemented this activity in 2012.

Description: This activity intends to reduce the number of invaluable housing dollars leaving Tacoma and the burden of administering port out vouchers while preserving portability in enumerate cases where it would advance important program goals. For these reasons, THA has limited the reasons a household may port-out. THA voucher holders are eligible to port-out when: their circumstances through an approved Reasonable Accommodation requires so; situations covered under the Violence Against Women Act (VAWA), and educational/employment circumstances. Households may also port-out when the receiving housing authority will absorb the voucher.

Planned Non-Significant Changes: THA does not anticipate any modifications to the baselines or benchmarks during the Plan year.

Planned Changes to Metrics/Data Collection: THA does not anticipate any changes to the baselines or benchmarks during the plan year.

Planned Significant Changes: THA does not anticipate additional authorizations for this activity during the Plan year.

15. Regional Approach for Special Purpose Housing

Plan Year Approved, Implemented, Amended: THA received authorization for this activity in 2012. THA used this activity to implement its local, non-traditional housing programs in 2013.

Description: THA is using this activity to add funds to the existing local infrastructure that provides housing assistance and services to families and young adults experiencing homelessness within the Tacoma/Pierce County area. Pierce County's Coordinated Entry system is the central intake for all individuals and families in Tacoma/Pierce county seeking assistance to exit homelessness. Households coming through central intake are assessed for the appropriate housing intervention and case management care needed to exit homelessness. Under this activity, THA pools resources with Pierce County to serve households without housing, or at serious risk of losing their housing and provide the supportive services needed to stabilize the household. THA's investment in Pierce County's Coordinated Entry system is used to assist households receiving services through Rapid Rehousing.

Expanding on this partnership, in late 2020, THA, Tacoma Public Schools (TPS), and Pierce County launched the Tacoma Schools Housing Assistance Program (TSHAP). TPS families identified as McKinney-Vento are referred to the contracted provider who engages them in a creative conversation to identify their needs and potential solutions to their housing challenges. Potential interventions include one-time prevention supports, diversion, or Rapid Rehousing, depending on a family's particular needs.

For households being served through TSHAP and Rapid Rehousing, THA will continue to count households assisted under this activity as "served" six months post participation. THA's partners report that THA funded service providers may still provide case management to households up to six months post program participation. Households are allotted a six-month period, similar to the "hold" voucher holders are permitted after being notified of a pending End of Participation (EOP). This provides a safety net for households who may still need support after their housing assistance has ended. This allows families to receive the services they need without requiring them to re-enter the Coordinated Entry system.

THA also uses the flexibility granted under this activity to designate one of its public housing scattered units as shelter to homeless and unaccompanied youth in Tacoma and Pierce County.

Planned Non-Significant Changes: THA does not anticipate any non-significant changes to this activity for the Plan year.

Planned Changes to Metrics/Data Collection: THA does not anticipate any modifications to the baselines or benchmarks during the plan year.

Planned Significant Changes: THA does not anticipate any significant changes to this activity for the Plan year.

16. Creation and Preservation of Affordable Housing

Plan Year Approved, Implemented, Amended: This activity was proposed in 2012 and implemented in 2012. This activity is to preserve and create affordable housing units under MTW. These units would be affordable housing units, not public housing and there will not require an operating subsidy. This activity was re-proposed in 2019 to include the use of MTW funds for Property-Based Rental Subsidies.

Description: The flexibility granted through this activity allows THA to acquire or develop affordable housing to households at or below 80% of AMI within the City of Tacoma. THA intends to allow eligible low-income families to reside in these units, including those that may be receiving HCV rental assistance. This activity allows THA to preserve affordable housing stock within Tacoma, especially in areas where rents are quickly becoming unaffordable. THA recognizes that this entire activity is under the parameters of PIH Notice 2011-45 and will abide with the notice when implementing this activity. THA has used this activity to increase the affordable housing stock in Tacoma in the following ways:

Property-Based Subsidies: In 2018, THA re-proposed the activity to utilize its flexibility to place property-based subsidies in up to 500 units. Property-Based Rental Subsidies are contributions to properties that agree to make its units available at a rental price affordable to very low-income households. THA contracts with property owners who agree to these terms and in return THA would make contributions to the property based on a negotiated contract where the tenant contribution plus the subsidy would not exceed the market value of the unit based on a rent comparability study. Eligible unit and housing types include but are not limited to: shared housing, cooperative housing, transitional housing, high-rise buildings, hotels/motels, and tiny homes.

*Development and acquisition***:** THA seeks to acquire existing rental housing in neighborhoods where THA doesn't have a strong presence to preserve housing affordability. Acquiring existing rental housing that is affordable to households earning 80% or less of the AMI is one of THA's rental housing preservation strategies. Under this activity THA is able to activate its broader use of funds ability so the agency could spend MTW dollars on construction and acquisition of affordable housing units. THA is using its MTW dollars to develop and/or acquire the following projects:

(1) Housing Hilltop – THA purchased 4 parcels in the surrounding Hilltop neighborhood. THA will develop a series of multi-family, mixed-use buildings which will serve as a catalyst for high quality residential and commercial development to ensure that the neighborhood amenities remain affordable. This will all be part of the Housing Hilltop plan.

(*2*) *1800 Hillside Terrace* – MTW funds were used to develop Bay Terrace, formerly Hillside Terrace. Phase I and II are completed and fully on-line. The development provides 74 newly constructed affordable housing units. The majority of the units are subsidized with project-based vouchers while 22 of the units are unsubsidized but remain affordable.

(3) *James Center North* – THA acquired a 7-acre retail and commercial area that poses a good transit-oriented development opportunity. It is also directly across the street from the Tacoma Community College and close to transit, shopping, and entertainment.   THA intends to develop an attractive, mixed-use development that will include apartments for people with a variety of incomes in amenity-rich West Tacoma.

(4) *1500 Block* - THA proposes to redevelop a property referred to as the 1500 Block. This property will be redeveloped with one and two-bedrooms that are conducive to low-income individuals and small households using LIHTC.

(4) *Intergenerational Housing* – THA is exploring an intergenerational housing project that will serve a multigenerational community where children who have experienced trauma can receive love and care from kinship and adoptive parents and live in a community with seniors who by living there agree to be respite caregivers, honorary grandparents and tutors to the families.

Planned Non-Significant Changes: THA does not anticipate any changes to this activity during the Plan year.

Planned Changes to Metrics/Data Collection: THA does not anticipate any modifications to the metrics or data collection during the Plan year.

Planned Significant Changes: THA does not anticipate any significant changes to this activity for the Plan year.

17. Housing Opportunity Program (HOP)

Plan Year Approved, Implemented, Amended: THA proposed and implemented this program in 2013 after receiving MTW approval. The activity was re-proposed in 2014 with updated program requirements.

Description: All new admissions to THA's tenant-based voucher program receive a HOP subsidy. A HOP subsidy is a fixed subsidy as opposed to a subsidy based on income. The fixed subsidy is determined by the household size at admission and 50% of the current payment standard. This is applicable for both elderly/disabled households and work-able households. However, work-able households are subject to five-year term limits; whereas, elderly/disabled households may receive assistance indefinitely. The goal of the program is to help our participants achieve self-sufficiency by assisting them with their housing needs for a specific term and to give other waiting households a turn to receive assistance.

Through the use of targeted funding, THA also provides a limited number of HOP subsidies to two programs: the College Housing Assistance Program (CHAP) and the Children's Housing Opportunity Program (CHOP).

>   **CHAP**: THA partners with the Tacoma Community College (TCC) to provide rental assistance to TCC's population of homeless and near homeless students. TCC provides services designed to help the families succeed so they are ready to be independent of housing subsidies after graduation. The program offers the same fixed subsidy as the HOP program and has a five (5) year limit on assistance. Graduates are considered a success and are transitioned off of the program with up two twelve (12) months of additional assistance to serve as an income-building year, not to exceed the five (5) year limit. The community college handles all eligibility but participants must be an active student at the community college and/or transferring to University of Washington, Tacoma. Students must stay in college and make satisfactory academic progress towards a degree or certificate.

>   **CHOP:** THA partnered with the Department of Children, Youth and Families (DCYF) to provide rental assistance to families who need housing to prevent or shorten their child's foster care placement or to house a teenager aging out of foster care who otherwise would begin his or her adulthood in homelessness. To date, CHOP has helped 33 families stay together or re-unite sooner.

HOP's extension/hardship policy may grant up to one year of additional rental assistance to households actively enrolled in a self-sufficiency activity that will likely increase the household's earned income (activities may include a degree program, FSS, or vocational certificate). To be eligible, a household must also be extremely rent-burdened (>50%) and without rental assistance (according to the payment standard). THA also provides a 90-day unexpected loss of income hardship extension for households who experience an unforeseen loss of income within 90 days prior to exit.

In 2020 and again in 2021, in response to the pandemic, THA adopted a moratorium on time limit exits from THA's voucher programs and suspended non-housing related program requirements. This moratorium goes through 2022.

Planned Non-Significant Changes: THA does not anticipate any non-significant changes to this activity during the Plan year.

Planned Changes to Metrics/Data: THA does not anticipate any significant changes to this activity in the Plan year.

Planned Significant Changes: THA is evaluating the efficacy of these programs, before and after the pandemic. The results from this evaluation may lead to significant changes, such as placing households on an income-based rental subsidy, elimination of time limits, and no longer enforcing non-housing related program requirements. As of the writing of this plan, staff are assessing the programs and considering possible modifications but do not have more specific information on program changes.

No additional waivers or authorizations will be needed to implement the changes under consideration.

18. Elimination of the 40% Rule

Plan Year Approved, Implemented, Amended: THA proposed and implemented this program in 2013 after receiving MTW approval.

Description: THA used this activity to waive the 40% cap on the percentage of income spent on rent. The goal is to allow for maximum resident choice in the voucher program and to substantially increase the participant's ability to understand the program and lease up more quickly. This activity has allowed more households in THA's voucher programs to lease units that they would have not had the opportunity to lease in the past. In addition, staff have saved time explaining the 40% rule to clients.

Planned Non-Significant Changes: THA does not anticipate any changes to this activity during the Plan year.

Planned Changes to Metrics/Data Collection: THA does not anticipate any modifications to the baselines or benchmarks during the Plan year.

Planned Significant Changes: THA does not anticipate any significant changes to this activity for the Plan year.

19. Modify the Family Self-Sufficiency (FSS) Program

Plan Year Approved, Implemented, Amended: THA proposed and implemented this program in 2013 after receiving MTW approval.

Description: Through its MTW flexibility, THA modified the way we calculate escrow payments to be simpler and provide clearer guidelines for participating families. THA has designed a savings calculation method under which families may qualify for one or more pay points. Pay points will be calculated and credited at the end of the FSS contract term and only if the family provides credible and verifiable documentation that show they qualify for each of the pay point credit types. Clients have reported the escrow is motivating and easier to understand. THA has also seen staff time saved, and the time is now being spent on direct service. Below are examples of pay points:

- $2,000 Maintain 32 hours/week employment for a minimum of 6 consecutive months

- $1,000 Complete ESL classes; Levels 1-5, $200 per level

- $100 Receive certificate of successful completion of financial literacy

- $3,000 Complete educational goal such as a GED, degree from an accredited school/college, vocational certificate, etc. Maximum escrow credit for achieving educational goals is $3000 per family.

- $500: 0-6 months vocational training certificate

- $750: 7-12 months vocational training certificate

- $1,000: 13-24 months vocational training certificate

- $1,500-Associate degree

- $2,000-Bachelor's degree

Planned Non-Significant Changes: THA is considering changes to its FSS program that may impact its program eligibility, length of its Contract of Participation, pay points, and types of services rendered by FSS staff. No additional waivers are needed to implement these changes.

Planned Changes to Metrics/Data Collection: THA does not anticipate any modifications to the metrics or data collection during the Plan year.

Planned Significant Changes: THA does not anticipate any significant changes during the Plan year.

20. MTW Seed Grants

Plan Year Approved, Implemented, Amended: This activity was proposed in 2013 and implemented in 2013.

Description: THA proposed this activity so, if needed, the agency could provide seed grants to partner service agencies to increase capacity to serve THA households. The grants would be specific to helping work-able households increase earned income and become self-sufficient. THA used this activity to provide three (3) job skills and soft skills trainings for work-able households in 2013. THA does not have specific goals for this activity in 2022 but would like to keep it in the implemented section of the plan in case an opportunity to leverage a partnership through the use of a seed grant arises.

Planned Non-Significant Changes: THA does not anticipate any changes to this activity during the Plan year.

Planned Changes to Metrics/Data Collection: THA has worked with HUD to implement new standard metrics for this activity and does not anticipate any changes to the baselines or benchmarks during the plan year.

Planned Significant Changes: THA does not anticipate additional authorizations for this activity during the Plan year.

21. Children's Savings Account

Plan Year Approved, Implemented, Amended: This activity was proposed in the 2014 MTW plan and implemented in the fall of 2015 as a pilot within the Salishan community, which is a HOPE VI redevelopment that created a mixed-income community of 1,350 renter and homeowner households on an award-winning design. As of 2021, THA offers children's savings accounts (CSAs) to the children living among all 12 of its managed properties.

Description: The program is aimed at developing a savings habit among students and their families and improving graduation rates, college and career preparation and enrollment. The program includes:

A partnership with the Washington State 529 Guaranteed Education Tuition (GET) program: Beginning in 2021, when a THA student opens a GET account, THA will set aside $500 for that student to earn into their GET account upon program completion. Previously, the CSA offered a two-phased earning model that included a seed and match for K-5th grade students and shifted to an academic-incentive earning structure for 6-12th grade students. The CSA has been redesigned to a simple flat-amount earning model of $500, which will be applied to new CSA enrollees in 2021. Students who joined the program prior to 2021 will be grandfathered in to earn $2,200 upon high school graduation, as well as any dollars previously earned through the K-5th grade seed and match.

Post-Secondary Planning & Navigation: THA program staff will coordinate engagement opportunities for families to receive educational and navigation supports to identify the goals they have for their future, plan for it and feel prepared to navigate it. We will do this in partnership with community partners who are experts in post-secondary and career preparedness, financial coaching and youth mentorship.

Experience and research strongly suggest that even modest balances in such accounts greatly increase the prospects that a student will attend college. For this reason, THA undertakes these efforts as part of its Education Project.

THA plans this effort in collaboration with the Washington Student Achievement Council, Tacoma Public Schools (TPS), Prosperity Now, Heritage Bank, initial funding from the Bill & Melinda Gates Foundation, Medina Foundation, College Spark, the Bamford Foundation, other funders, and the collaboration of banking and social service partners in Tacoma. Further funding will determine the scope and schedule for this initiative.

Planned Non-Significant Changes: THA does not anticipate any changes to this activity during the Plan year.

Planned Changes to Metrics/Data Collection: THA anticipates modifications to the baselines or benchmarks during the plan year and will update the metrics when the data becomes available. Modifications to program benchmarks will consider the impacts of the program expansion to additional THA family properties and rates of family engagement with financial and post-secondary navigation learning opportunities. Data will be collected through the GET program and shared with THA.

Planned Significant Changes: THA does not anticipate additional authorization for this activity this planning year.

22. Exclude Excess Income from Financial Aid for Students

Plan Year Approved, Implemented, Amended: This activity was proposed in the 2014 MTW Plan. This activity was implemented in 2020.

Description: The purpose of the activity is to further encourage self-sufficiency among participants and streamline administrative processes**.** To achieve this aim, THA modifies the administration of the full-time student deduction by excluding 100 percent of a student's financial aid. THA does this for its tenant-based voucher programs and for THA residents living within THA's portfolio. THA excludes excess income from student financial aid from the income calculation used to determine initial eligibility into THA programs and for a household's calculated income for re-certifications and interims.

Planned Non-Significant Changes: THA does not anticipate any modifications to the baselines or benchmarks during the Plan year.

Planned Changes to Metrics/Data Collection: THA has introduced the metrics it will use to report on this activity. See above.

Planned Significant Changes: THA does not anticipate any significant changes in the Plan year.

24. Rental Assistance Success Initiative (formerly) Local Security and Utility Deposit Program

Plan Year Approved, Implemented, Amended: THA proposed this activity in its 2014 MTW Plan and implemented the program in January 2016. Minor amendment in 2019.

Description: Initially this activity was solely a security deposit assistance program that was open to THA applicants in its Tacoma Public Schools Special Housing Project, its College Housing Assistance Program, and any of THA's affordable housing applicants/residents who needed assistance in order to move into a unit. THA realized that many households did not have the resources to pay the security deposit once they reached the top of the waitlist and were offered a unit. This program ensured that families could afford to move into the unit when they come to the top of the waiting list. It would also reduce the number of unit turndowns THA receives. For those moving into THA properties, in order to receive assistance through the Security Deposit Assistance Program (SDAP), the household must be at/or below 30% AMI.

In addition to SDAP, THA modified the program in its 2019 Plan to expand the flexibility within this activity to include potential incentive programs to encourage property owner participation in THA's rental assistance programs.

THA plans to use its MTW authority to implement additional programs and activities that will lead to increased participation and utilization of its highly valued housing assistance. THA has focused on developing strategic relationships with landlords to strengthen relationships and has created a new position, Landlord Engagement Specialist, to lead this work.

THA's landlord engagement specialist was able to successfully partner with participating landlords to develop a "Renter Readiness" course and certification. Landlords will reduce screening criteria for THA households that have successfully completed the course. Due to COVID-19, this course has been moved entirely online and has been met with great reviews.

Renters Readiness Certification is going strong, more households are attending the class now that it is held online. Tacoma Public Utilities (TPU) is finalizing an agreement with Sound Outreach, to offer low-income attendees that qualify a credit on their TPU bill upon completion of all 3 classes.

In 2021, THA implemented a pilot program for housing navigation assistance for THA's Mainstream program and the College Housing Assistance (CHAP) program. These program participants tend to have greater barriers, increasing the time it takes them to successfully lease-up.

Planned Non-Significant Changes: THA does not anticipate any modifications to the baselines or benchmarks during the Plan year.

Planned Changes to Metrics/Data Collection: THA does not anticipate any modifications to the baselines or benchmarks during the plan year.

Planned Significant Changes: THA does not anticipate any significant changes in the Plan year.

25. Modify HQS

Plan Year Approved, Implemented, Amended: THA proposed this activity as an amendment in its 2019 Plan and received HUD approval in 2019.

Description: THA must inspect all units for Housing Quality Standards (HQS) to ensure that federally-assisted units are safe, clean and decent. THA made some modifications to its HQS processes to achieve staff time savings and reduce the time a THA client must wait until they are permitted to move-in. These modifications aim to reduce the administrative burden upon both THA and landlords and to encourage Tacoma housing providers to rent to THA voucher holders. To achieve these goals THA made the following changes:

1. In lieu of re-inspections for a failed HQS initial inspection, landlords may provide evidence that fail items that are outside of THA's prescribed 'life-threatening' category have been cured. THA clients may move into the unit quicker since they no longer have to wait for an additional inspection to be completed. Landlords are still required to cure fail items within 30 days and THA will still conduct annual HQS inspections and audit inspections for quality control.

2. To achieve staff time savings THA will accept a "Certificate of Occupancy" issued by the City of Tacoma in lieu of an initial inspection. Future annual HQS and audit inspections will still be completed to ensure quality control.

3. To further streamline THA's HQS processes, THA will negotiate its own contract rents and determine rent reasonableness. This is broadly applied to all THA owned, managed or subsidized units.

In addition, THA has considered implementing a triennial inspection schedule for its housing portfolio (units owned and managed by THA) to streamline the inspection process and reduce disruption to residents' lives. THA's Portfolio includes units layered with PBV assistance and LIHTC which both require regular inspections.

Finally, in 2021, HUD approved a proposal that allows THA to adjust operations and policies, as needed, during times of declared emergencies. See Appendix D: THA's Emergency Operations. During the COVID pandemic, HUD waived certain program requirements and rules that helped public housing authorities respond to the pandemic. Using MTW flexibility, THA has adopted similar waivers for future use during times of emergency that would significantly disrupt daily operations for THA staff and residents, clients, and applicants.

Planned Non-Significant Changes: THA seeks HUD approval for the following activity updates:

Initial Self-Certifications for THA-Owned Units: In lieu of an initial inspection completed by Rental Assistance HQS Inspection Staff, we are proposing that we accept "self-certified inspections" from Property Management staff. Qualified and trained PM staff will certify that the

unit has been inspected and that the property meet HUD and THA HQS inspection standards. These self-certifications would be documented through the submission of an HQS inspection check-list for each unit. Rental Assistance HQS Staff would then QA a certain percentage of these units each year. Eligible units are those owned by THA directly or in partnership with THA. Only units with construction dates after 1978 would be eligible for participation.

Pre-inspections: Pre-inspections would be allowed for any units that previously had an HCV tenant and/or for units owned by landlords that express interest in renting to a voucher holder. Pre-inspections would be good for 90 days.

No additional waivers or authorizations are required to implement these proposals.

Planned Changes to Metrics/Data Collection: THA does not anticipate any changes to metrics and data collection.

Planned Significant Changes: THA does not anticipate any significant changes in the Plan year.

NOT YET IMPLEMENTED

Special Program Vouchers:

Implementation Description: This activity was proposed in 2011 but not yet implemented. The initial idea was to establish a Special Program Voucher program similar to the project-based voucher program. Vouchers were to be awarded to service partners for a special purpose or a special program. The service partners would be responsible for designing the program. This includes selecting households for the program, establishing program guidelines and eligibility criteria, length of time a household would be eligible for a voucher, level of assistance provided to each household, etc. THA would then oversee the administration of these vouchers through an annual reporting and/or audit process.

Status Update: This activity was proposed before HUD issued guidance on local non-traditional programs. THA now proposes any new activity that is not directly operated by our agency as a separate local non-traditional program activity. No activities are being operated under this activity as of now. There is not a timeline in place to use this activity.

Modifications to the activity since approval: THA does not anticipate any changes to this activity during the Plan year.

ON HOLD

N/A

CLOSED OUT

2. ESHAP: THA proposed and implemented this activity in 2011 and closed this activity in 2019. The activity began as a pilot program to assist homeless families enrolled at McCarver Elementary School. McCarver was known for its high transient rates. The initial design was intended to stabilize families enrolled at McCarver Elementary and as a result as positively impact the high rates of transiency at McCarver. Since its implementation ESHAP has seen changes to its program structure – which included lifting program participation requirements, expanding eligibility for enrolled families to other elementary schools and providing a subsidy similar to THA's traditional HCV model. After evaluation and community consultation, ESHAP will be expanded but also redesigned to function more similarly to the Coordinated Entry model. This will be done in partnership with Pierce County and the Tacoma Public School District. This activity has been closed out and metrics and data regarding future TSHAP families will be reported under Activity 15.

4. Allow Transfers Between Public Housing and Voucher Waitlists This activity was proposed and implemented in 2011. THA created transfers to make it easier for families to move to a unit that better meets their needs. Households on the public housing transfer list can be issued a voucher if there are no units that meet their needs. The activity has made it easier for reasonable accommodation clients to find units that meet their needs. THA's portfolio is almost completely PBV, making this activity obsolete.

9. Modified Housing Choice Voucher Activity: THA proposed this activity in 2011 and has yet to implement it. The activity proposed to modify the annual inspection process to allow for biennial inspections of qualifying HCV units (instead of yearly). Since HUD guidance was released on biennial inspections allowing any PHA to perform them, this activity was closed out in 2015.

13. Local Blended Subsidy: THA proposed this activity in 2012 but has not implemented it. The activity was created so that THA could create a local blended subsidy (LBS) at existing and, if available, at new or rehabilitated units. The LBS program would use a blend of MTW Section 8 and public housing funds to subsidize units reserved for families earning 80 percent or below of area median income. Because of the complicated nature of this activity, THA has not implemented it. THA has been approved for a RAD conversion in 2014/2015 which caused this activity to be closed out in 2015. The units may be new, rehabilitated, or existing housing. The activity is meant to increase the number of households served and to bring public housing units off of the shelf.

14. Special Purpose Housing: THA proposed this activity in 2012 and has not implemented it. The activity was meant to utilize public housing units to provide special purpose housing and improve quality of services or features for targeted populations. In partnership with agencies that provide social services, THA would make affordable housing available to households that would not be admitted to traditional public housing units. With this program, THA would sign a lease with partner agencies to use public housing units both for service-enriched transitional/short-term housing

and for office space for community activities and service delivery. The ability to designate public housing units for specific purposes and populations allows units to target populations with specific service and housing needs and specific purposes, such as homeless teens and young adults. Because of the RAD conversion, THA closed this activity in 2015.

Section V: Sources and Uses of MTW Funds

Planned Application of MTW Funds

Estimated Sources of MTW Funding for the Fiscal Year		
PHAs shall provide the estimated sources and amount of MTW funding for the Fiscal Year		
SOURCES		
FDS Line Item	**FDS Line Item Name**	**Dollar Amount**
70500 (70300+70400)	Total Tenant Revenue	-
70600	HUD PHA Operating Grants	$ 50,885,000
70610	Capital Grants	$500,000
70700 (70710+70720+70730+70740+70750)	Total Fee Revenue	$ 2,750,000
71100+72000	Interest Income	$ 22,000
71600	Gain or Loss on Sale of Capital Assets	$ -
71200+71300+71310+71400+71500	Other Income	$ 667,000
70000	Total Revenue	$ 54,824,000

	Estimated Uses of MTW Funding for the Fiscal Year	
PHAs shall provide the estimated uses and amount of MTW funding for the Fiscal Year		
USES		
FDS Line Item	**FDS Line Item Name**	**Dollar Amount**
91000 (91100+91200+91400+91500+91600+91700+91800+91900)	Total Operating - Administrative	$12,350,000
91300+91310+92000	Management Fee Expense	$ 150,000
91810	Allocated Overhead	$ -
92500 (92100+92200+92300+92400)	Total Tenant Services	$ 1,568,000
93000 (93100+93600+93200+93300+93400+93800)	Total Utilities	$ 68,000
93500+93700	Labor	$ -
94000 (94100+94200+94300+94500)	Total Ordinary Maintenance	$ 359,000
95000 (95100+95200+95300+95500)	Total Protective Services	$ 75,000
96100 (96110+96120+96130+96140)	Total Insurance Premiums	$ 131,000
96000 (96200+96210+96300+96400+96500+96600+96800)	Total Other General Expenses	$ 112,000
96700 (96710+96720+96730)	Total Interest Expense and Amortization Cost	$ -
97100+97200	Total Extraordinary Maintenance	$ 35,000
97300+97350	Housing Assistance Payments + HAP Portability-In	$ 44,080,000
97400	Depreciation Expense	$ 900,000
97500+97600+97700+97800	All Other Expenses	$ -
90000	Total Expenses	$ 59,828,000

Planned Application of MTW Funding Flexibility

Listed below are some of the specific ways in which THA plans to exercise its MTW flexibility:

• THA is making changes to relieve the administrative burden on both the agency and the tenants by creating a more streamlined approach to both the certification process and inspections. THA intends to make its processes less intrusive on people with fixed incomes such as the elderly and disabled, and to relieve families from some of the more burdensome requirements of annual certification. The new certification cycle started in 2013.

• THA is focusing on housing, employment-related services, and other case management activities that will move families towards self-sufficiency. Its Client Support and Empowerment Department also assists tenants that are facing challenges in successful tenancy.

• THA is adjusting administrative staff as necessary to ensure that activities are in line with the agreement. THA is in the midst of making necessary technological enhancements that will benefit the organization and residents.

• THA is analyzing its administrative overhead and charge expenses directly to the programs whenever possible. The agency is charging administrative or previously allocated costs to a Program Support Center for each of its three activity areas as identified in the Local Asset Management Plan, along with a Community Services Central fund to track expenses associated with those functions.

• THA wrote an activity in its 2012 amended plan that allows the agency to activate the single fund flexibility and to spend MTW money on the development, and preservation of affordable housing.

• THA is partnering with local agencies in the community to create local non-traditional housing programs. The programs are funded by THA but run by partnering agencies.

• THA has developed a property-based subsidy program. Under this model, THA makes an annual contribution of MTW funds. The owner then rents these units to low-income households at a rent affordable to these households. THA inspects the units annually and reviews a percent of tenant files annually to ensure the owner is renting to low-income households.

• In response to the catastrophic impacts associated with the COVID-19 pandemic, THA is implementing an eviction prevention fund. This fund provides emergency, one-time rental assistance to qualified residents to ensure they can maintain stable housing.

Planned Application of PHA Unspent Fund and HCV Funding

Original Funding Source	Beginning of FY - Unspent Balances	Planned application of PHA Unspent Funds during FY	Amount	Time frame
HCV HAP	$6,500,000 - estimated	IT Platform upgrade/switch	$ 2,500,000	2022-2023
		Business Process Improvement	$ 1,000,000	2022-2024
		Faircloth RAD units	$ 1,500,000	2022-2025
		Section 8 HOPP increases	$ 1,500,000	2022-2023
		Maintain 4 months MTW Operating Expense in Reserve (Non-HAP)	$ 5,000,000	In Perpituity
HCV Admin Fee	$ -			
PH Operating Subsidy	$ -			

Local Asset Management Plan

Is the PHA allocating costs within statute?   [   ] or [No]

Is the PHA implementing a local asset management plan (LAMP)?   [Yes] or [   ]

If the PHA is implementing a LAMP, it shall be described in an appendix every year beginning with the year it is proposed and approved. The narrative shall explain the deviations from existing HUD requirements and should be updated if any changes are made to the LAMP.

Has the PHA provided a LAMP in the appendix?   [Yes] or [   ]

There are minimal changes in the 2020 LAMP from the 201. It reflects the fact all but 4 of our remaining public housing units within our Tax Credit portfolio will be transitioned to RAD in 2019; and updates our Management Fee Schedules.

Rental Assistance Demonstration (RAD) Participation

Description of RAD Participation

RENTAL ASSISTANCE DEMONSTRATION (RAD) PARTICIPATION
• In April 2016, THA closed on the conversion of 456 units. Rehab on those units was completed on 12/31/2017.   • Between October 2019 and December 2019, THA closed on the conversion of 323 additional units. This was a transition in which no new Capital Financing was involved.   • THA's original significant RAD amendment was submitted to HUD 7/27/2015 and was approved on 9/14/2015.

Has the MTW PHA submitted a RAD Significant Amendment in the appendix? A RAD Significant Amendment should only be included if it is a new or amended version that requires HUD approval.

No

If the MTW PHA has provided a RAD Significant Amendment in the appendix, please state whether it is the first RAD Significant Amendment submitted or describe any proposed changes from the prior RAD Significant Amendment?

N/A

Section VI: Administrative

Board Resolution and Certification of Compliance

Forthcoming.

Documentation of Public Process

Notice of Public Comment Period and Public Hearing

The Tacoma Housing Authority (THA) invites residents, voucher holders, partners and community members to comment on THA's proposed **2022 Moving to Work (MTW) Plan**. The proposed Plan outlines the agency's priorities for the next year, including how it will use its MTW federal regulatory flexibility to serve its participants, community, and partners.

THA will receive comments regarding the proposed 2022 MTW Plan during a 30-day public comment period: **August 2, 2021, to August 31, 2021**. All comments must be received by 5:00 p.m. on August 31, 2021.

Mail, Email or Phone Comments To:

Katie Escudero
Interim Director of Policy, Innovation, and Evaluation

Mail   902 S. L Street, Tacoma, WA 98405

E-mail   kescudero@tacomahousing.org

Phone   253-448-2796

You can also attend a virtual public hearing to share your questions and comments:

Topic: Virtual Public Hearing for THA's 2022 MTW Plan
Date: August 19, 2021
Time: 4:00 PM Pacific Time

https://us02web.zoom.us/j/87056262752?pwd=VHd4Vnpyc3V2T0hXUjVmMWtXanZXZz09

Meeting ID: 870 5626 2752
Passcode: 410229

The Tacoma Housing Authority Board of Commissioners will vote on the adoption of the plan on Wednesday, September 22, 2021.

Meeting dates, locations, and times are subject to change. Up-to-date information is posted on the Tacoma Housing Authority (THA) website. You may contact Katie Escudero the week prior to the scheduled meeting to confirm this information. Persons requiring special accommodations should contact Katie before 4:00 p.m. the day before the scheduled regular meeting.

Planned and Ongoing Evaluations

Housing Opportunity Program Evaluation: THA's Department of Policy, Innovation, and Evaluation (PIE) has been investigating the efficacy and impacts of three of its time-limited, flat subsidy programs, which were created using THA's MTW flexibility. They include: the Housing Opportunity Program (HOP), Child Housing Opportunity Program (CHOP), and College Housing Assistance Program (CHAP). The report summarizes the available evidence on the programs' efficacy, before and after the pandemic, by exploring four overarching themes that reflect the program life cycle:

1. *Leasing: At what rate do HOP households successfully lease a unit?*
2. *Income: Does a HOP household's income change while receiving assistance?*
3. *Program Exits: When and why does a HOP household exit the program?*
4. *Rent Burden: What level of market rent burden does a HOP household face at exit?*

The general Housing Choice Voucher (HCV) population was used as a comparison group when data was available.

Tacoma Schools Housing Assistance Program (TSHAP) Evaluation: In partnership with the Foundation for Tacoma Students, THA will evaluate the first couple of years of outcomes associated with the TSHAP program. The evaluation will assess economic mobility, housing stability, and academic stability and success.

Lobbying Disclosures

DISCLOSURE OF LOBBYING ACTIVITIES

Complete this form to disclose lobbying activities pursuant to 31 U.S.C. 1352
(See reverse for public burden disclosure.)

Approved by OMB
0348-0046

1. Type of Federal Action:	2. Status of Federal Action:	3. Report Type:

b   a. contract
     b. grant
     c. cooperative agreement
     d. loan
     e. loan guarantee
     f. loan insurance
	NA a. bid/offer/application
	     b. initial award
	     c. post-award
		a a. initial filing
		     b. material change
		 For Material Change Only:
		     year _____ quarter _____
		     date of last report _____

4. Name and Address of Reporting Entity: [X] Prime [ ] Subawardee Tier _____, *if known*: Congressional District, *if known*: 4c	5. If Reporting Entity in No. 4 is a Subawardee, Enter Name and Address of Prime: Congressional District, *if known*:

6. Federal Department/Agency: Department of Housing and Urban Development	7. Federal Program Name/Description: MTW Annual Plan CFDA Number, *if applicable*: _____

8. Federal Action Number, *if known*:	9. Award Amount, *if known*: $

10. a. Name and Address of Lobbying Registrant (*if individual, last name, first name, MI*):	b. Individuals Performing Services (*including address if different from No. 10a*) (*last name, first name, MI*):

11. Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when this transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.	Signature: *April Black* Print Name: April Black Title: Acting Executive Director Telephone No.: (253) 207-4474 Date: 9/7/2021

Federal Use Only:	Authorized for Local Reproduction Standard Form LLL (Rev. 7-97)

Appendix A: Letter of Consistency

Forthcoming

Appendix B: LAMP

A.   **Background and Introduction**

The First Amendment to the Amended and Restated Moving to Work Agreement authorize Tacoma Housing Authority (THA) to design and implement a Local Asset Management Program (LAMP) for its Public Housing Program and describe this program in its Annual MTW Implementation Plan. The term "Public Housing Program" means the operation of properties owned or units in mixed-income communities subsidized under Section 9 of the U.S. Housing Act of 1937, as amended ("1937 Act") by the Agency that are required by the 1937 Act to be subject to a public housing declaration of trust in favor of HUD. The Agency's LAMP shall include a description of how it is implementing project-based property management, budgeting, accounting, and financial management and any deviations from HUD's asset management requirements. Further, the plan describes its cost accounting plan as part of its LAMP, and in doing so it covers the method for accounting for direct and indirect costs for the Section 8 Program as well.

The existing Property Management structure has been in place for several years now. THA has operated using project-based budgeting with on-site administrative and maintenance personnel responsible for the majority of the tasks associated with managing the properties. Our cost approach allocates all indirect revenues and expenses to a Program Support Center (based on unit count) and then charges fees to the programs and properties as appropriate.

B.   **Guiding Principles**

The City of Tacoma established the Tacoma Housing Authority under State of Washington legislation in 1940 through resolution. The resolution states that the City formed the Housing Authority to address a "shortage of safe and sanitary dwelling accommodations in the City of Tacoma, Washington available to persons of low-income at rentals they can afford." Since then, THA has strived to meet the ever-increasing demands for low-income housing in the Tacoma area. With acceptance into the Moving to Work (MTW) program in 2010, THA took on three additional statutory objectives that further define the Agency's role on both a local and a national scale. THA is required to keep these objectives in mind through the development of each activity related to MTW, including the development of the LAMP. The three statutory objectives are: 1) reduce cost and achieve greater cost effectiveness in Federal expenditures; 2) give incentives to families with children whose heads of household are either working, seeking work, or are participating in job training, educational or other programs that assist in obtaining employment and becoming economically self-sufficient; and 3) increase housing choices for low-income families [Section 204(a) of the 1996 Appropriations Act].

C.   Description of Asset-Based Operations

Overview of Organizational Structure

THA's Property Management Department is responsible for the day-to-day operations of THA's portfolio and the Administration Department is responsible for Asset Management and compliance. The chart below shows this relationship and the positions responsible for these management functions.

Figure 1: Organizational Structure

Description of 2021 Plan

THA manages its properties as 2 portfolios.   We have Portfolio West, which consists of our 456 Renew Tacoma Housing (RTH) RAD units comprised of 9 properties of Elderly/Disabled and Family Housing. Our Hillside/Bay Terrace properties which comprises 5 properties and 270 units is also considered under our Portfolio West umbrella, as is our Arlington Youth Housing property (58 units).   As these properties are spread out, we have management teams overseeing property groupings as best determined by the Director.

The other management group is called Portfolio East and is responsible for management of our Salishan properties (seven), consisting of 631 units.   As Salishan is in one geographical area, there is a centralized management team to manage those properties. We transitioned to a Portfolio Manager that that oversees both of our portfolios in 2020.

Asset and Compliance Management

While the Property Management Department oversees the day-to-day operations of the properties, THA's Asset Management and Compliance Division oversees the long-term strategic objectives of the properties. Having an Asset Management and Compliance Division enables THA to effectively plan for the future, ensure compliance with Local and HUD regulations, and keep the agency's strategic objectives at the forefront when making both operational and strategic decisions. Included within the scope of this division are the following responsibilities:

- Risk Management
- Compliance (file audits, PIC, finding resolution)
- Budget Oversight
- Financial Reporting and Modeling
- Capital Needs Assessment
- Property Performance Review
- Strategic Planning
- Policy Development and Implementation
- Procurement Regulation

Project-Level Reporting

THA instituted project-based budgeting and accounting practices before becoming an MTW agency. Systems and reporting are in place to develop and review onsite management of budgets, expenses, rent collection and receivables, and purchasing. With our current IT system, we are developing more robust reporting to review, analyze and compare property information.

Maintenance Operations

In accordance with HUD Asset Management guidance, THA instituted a decentralized maintenance program in 2008. During 2011, THA realized efficiencies in the maintenance of its Salishan properties by assigning maintenance personnel to the entire Salishan portfolio, rather than each of the individual projects. We continually review our practices and how they are working and update our approach when needed. We have a Facilities Manager position whose responsibility it is to oversee overall maintenance in our properties.   We currently have a Maintenance supervisor and four maintenance leads with more technical abilities who assist other maintenance specialists and oversees repairs and work orders in the two portfolios.   Each portfolio has a team of maintenance specialists that perform work orders and repairs for the different properties in their portfolio.   In 2018, we also instituted a unit turn team concept, which consists of 5 staff, including a lead, whose specific responsibility is to turn vacant units within all of our properties. The goal is to bring down costs, by having a dedicated team, and using less contract maintenance.   It is important to note that when working in a unit, the maintenance personnel are charged directly to the property they are working in.

Acquisition of Goods

THA has been operating under a decentralized purchasing model for the acquisition of goods. Site staff is primarily responsible for purchasing supplies for the properties they oversee. Purchases are primarily completed through a P-Card system, while in certain circumstances Purchase Orders continue to be used.

Acquisition of Services

While the acquisition of goods is decentralized, the agency has adopted a hybrid approach to the acquisition of its services. Centralized duties include the oversight of the contract needs of the sites, management of the bid process, vendor communication, and contract compliance. The sites are responsible for scheduling work, approving invoices, working with the centralized staff to define scopes of work, and ensuring the work is done properly.

D.   Strategic Asset Planning

THA's Asset Management Committee

THA has an Asset Management Committee consisting of key members from the following functional areas in the agency: Finance, Asset Management and Compliance, Property Management, Client Support, and Real Estate Development. The committee meets on a routine basis and is facilitated by the Agency's Asset Manager. The standing agenda includes reviewing operational costs at each site, investigating large cost variances between the properties, analyzing property performance metrics, and comparing cost data and operational data to industry standards. THA also uses financial models to compare our metrics to properties managed by private firms. The committee also considers any policy changes having a potential impact on the operation of its properties and decisions regarding property acquisition and disposition. Some examples of policy changes discussed here include changes to THA's current rent policy and occupancy standards, whether properties should be managed by agency staff or third-party management.

The overall purpose of the committee is to ensure that THA makes decisions in a way that fosters appropriate communication between the major functional areas concerned with Asset Management and address related issues and concerns from a holistic perspective.

The cost approach developed by THA as described in the next section of this LAMP allows this committee and others in the agency to make informed decisions concerning the agency's portfolio. The cost approach will clearly show which areas of the agency cost the most to run and which provide the most value to the mission of the agency.

E.   Cost Approach

THA's current cost approach is to charge all direct costs related to day-to-day operations to the specific property or program fund and to charge all indirect costs to a central fund (see "Program Support Center" below). The PSC would then earn fees that they charge to the programs they support. Client Support and Empowerment expenses that benefit THA's Affordable Housing properties will be charged out to a direct grant or the Moving to Work program. For purposes of this Cost Approach, properties refer to ones that THA owns or manages and the term program refers to the Rental Assistance and Moving to Work programs administered by THA. By the end of 2019, THA will own only five Public Housing units outright. We converted our existing ACC Public Housing portfolio to RAD, setting up a new Tax Credit entity in 2016. The remaining Public Housing units are owned by our existing Tax Credit entities, and all except Hillside 1500, with 4 PH units were converted by the end of 2019. We currently manage our properties in our Tax Credit entities.

THA developed this approach for the following reasons:

1. It allows the agency to easily see the costs directly related to the day-to-day operations of a property or program and determine whether the management of that cost center can support itself. Staff managing the programs and properties will be able to easily discern all related administrative and shared costs. Managers will negotiate if costs are determined unreasonable or if the AMP or program cannot support the proposed fees.

2. One of the goals of the MTW program is to increase administrative efficiency. By charging these costs out as a fee, it will be easier in the future to identify the administrative efficiencies at the program/project level and the indirect costs that support them.   The tax credit entity fees paid to THA is based on a % of their Operating Income and is distributed to the various support areas within THA.

Activity Areas

THA created three separate activity areas in order to track what it costs the agency to support different types of activities in which the agency engages. The three activity areas are:
- Conventional Affordable Housing (MTW)
- Tax Credit Management (MTW)
- Business Activities (Non-MTW)

THA decided to separate MTW activities into Conventional Affordable Housing and Tax Credit Management in order to tell how much it costs to manage its Tax Credit Portfolio versus its other affordable housing programs, including any remaining Housing properties we may manage, and Section 8. THA considers any other activities as Non-MTW activities and the revenues and expenses fall under the Business Activity area.

Program Support Center

Each of the three activity areas (Business Activities, CAH Activities and Tax Credit Activities) will have a Program Support Center (PSC). This is the equivalent of the Central Office Cost Center (COCC) under the HUD Asset Management model and it contains all of the programmatic support costs related to each of the three activity areas. The expenses will be split out to one of the three support centers based on unit equivalency and where the project or program resides to more clearly identify where administrative expenses fall and measure either the profitability or cost to each of the identified areas.

The end of this plan indicates the breakdown of how the administrative cost portion of the PSC will be charged out.

Direct Costs

Any costs that directly and wholly support a particular project or program will be charged as Direct Costs to the respective project or program. The following chart outlines which costs are considered Direct Costs.

Program Area	Cost Type	Comments
Property Management	Personnel Costs	
	Office Rent	
	Insurance	Includes property and liability insurance directly related to the AMP
	Program Support Fees	Fees charged to the properties for administrative overhead and costs allocated out that are not under the direct purview of the managers
	Administrative Costs	Includes postage, legal, office supplies, training and travel, mileage, professional services, and eviction costs
	Maintenance Costs	Includes materials, maintenance personnel costs, and contracts
	Utilities	
	Security	
	Relocation due to Reasonable Accommodation	
	Collection Loss	
	PILOT	
	Debt Service Payments	
	Audit Costs	
Rental Assistance	Personnel Costs	
	Office Rent	
	Insurance	
	Program Support Fees	HUD fees and leasing
	HAP Expenses	
	Audit Costs	
	Administrative Costs	Includes postage, legal, office supplies, training and travel, mileage, professional services, and eviction costs

Table 1: Direct Costs

Indirect Costs (Program Support Fees)

Any indirect costs incurred by THA in support of its projects and programs will be incurred by the Program Support Center. The fees are:

- Administrative Support Fee based on HUD model. This also includes IT, Elderly Service coordinator and leasing cost. We choose not to allocate any costs out to a program or project that is not under their direct control.

Project Support Fee

The Administrative Support Fee will cover the costs of the services provided by the following:

- Executive Department
- Purchasing
- Asset Management, including compliance
- Human Resources Department
- Client Support and Empowerment
- Accounting and Financial Services
- Real Estate Management and Improvement and Capital Fund Monitoring
- Information Technology
- Reasonable Accommodations
- Leasing and Elderly Services Coordinator
- Policy, Innovation and Evaluation

There will be two separate rates, one for Rental Assistance programs and one for managed housing units. The fee charged to Rental Assistance will be charged to all Rental Assistance Baseline units (MTW Vouchers, FUP, NHT, VASH, etc.) Our MTW vouchers (other than RAD) and Mod Rehab properties will be charged based on our MTW baseline regardless of occupancy.   RAD our special program (FHP, NHT, VASH) will all be charged based on occupancy. The following chart shows how these fees are derived. For Rental Assistance, THA is using the HUD prescribed Management Fee. The Bookkeeping fee is reduced to correspond to a more accurate cost of defined support to the program. The IT fee is also reflective of direct support to the program.   The Property Management units we manage are almost exclusively Tax Credit properties and their fees are based upon an agreed upon % with our Tax Credit partners and investors in their respective Operating Agreements. We do make decisions as to how we will break those fees down once they are received at THA. Fees that would be allocated out (leasing, Elderly Services coordinator, IT) are charged as part of the fee in order not to have any expenses allocated out that Property managers do not have any control over.

Administrative Support Fee Components		
Fee	**Rental Assistance**	**Tax Credit**
Management Fee		
Executive	$2.00	$2.00
Human Resources	$1.50	$2.00
PM O'hd (including rent)	$2.50	Remaining
Bookkeeping Fee	$6.00	$20.00
Asset Management Fee	$0.00	$10.00
IT Fee	$6.50	$9.00
Community Services	$3.00	$2.50
Leasing Support		$1.50
Total Fee:	*$21.50*	*$47.00*

Table 2: Administrative Support Fee Components

Cost Centers

Property Management

Property Management uses of funds includes the Direct Costs and Project Support Fees for all of the properties managed by THA. The Property Management source of funds includes Capital Fund, Tenant Revenue, Operating Subsidy, and Other Revenue. By the time this is submitted, THA should be finalizing the conversion of all but five of our remaining Public Housing units in existing Tax Credit entities to RAD.

Rental Assistance

Rental Assistance uses of funds include the Direct Costs and Program Support Fees for all of the voucher programs managed by THA's Rental Assistance Division. These programs include Housing Choice Voucher (HCV), SRO, Project-Based Vouchers, FUP, VASH, NHT, and HUD FSS. The sources for Rental Assistance primarily include HAP Revenue and the Administrative Fees paid to the agency by HUD.

In addition to the fees Rental Assistance pays to the Program Support Center, there are other fees paid and earned in this area. All direct costs for all of the Rental Assistance programs will be recorded in our main Section 8 HCV fund in the MTW program. A fee will then be charged to our SRO and non MTW Section 8 programs based on unit equivalencies. This fee will be income earned by the MTW Section 8 HCV program for reimbursement of the expenses incurred by them. The chart below shows the equivalencies used.

Client Support and Empowerment (CSE)

The Client Support and Empowerment department supports all THA's Affordable Housing clientele and assists families to move to Self Sufficiency. As we continue to transition our new Voucher holders over to the Housing Opportunities (HOP) program that is both time limited, and a fixed subsidy program, these services have become more important. Additionally, THA has received several grants that provide funding for a variety of services to its clients. Most of these grants do not come with coverage of administrative overhead. None of the income or expenses for direct grants will be part of the MTW program, but overhead costs not reimbursed by the grants will.

THA's CSE area has traditionally assisted clients when Property Management staff has requested their assistance to help families remain viable tenants when in crisis. Moving to Work status has allowed the agency to continue that role, along with assisting families in a more pro-active way to move towards self-sufficiency.

THA's CSE department will either hire caseworkers or collaborate with other agencies to assist families at different levels. CSE works with families who face hardship and cannot meet minimum rent or lease requirements, prepares them to succeed as tenants, and assists tenants in obtaining skills that allow them to become self-sufficient. THA is proud of this focus. It is what makes us more than a real estate

developer, more than a landlord, and more than a manager of rental assistance. This is the work that makes us a social justice agency. This is the work that makes us an MTW housing authority.

In the agency's approach to CSE for the LAMP, the following applies:
- Income and Expenses directly related to a grant is not included in the MTW area.
- All administrative overhead not covered by these grants are charged to a CSE fund that tracks all MTW costs.
- The Elderly/Disabled Coordinator is charged out as a portion of the management fee to the elderly/disabled projects.
- The costs for the CSE staff assisting the agency's Property Management portfolio and MTW Voucher holders, along with the administrative costs associated with it, are charged to a CSE fund supported by the agency's MTW flexibility.
- Costs for both our Education Initiative and Asset Building Programs that are not covered by grant funds would be paid out of MTW funds.

In taking this approach, it allows the Client Support and Empowerment department to operate as a business activity. It is set up in such a manner that THA's Property Management area must negotiate for the level of service it desires and pays to receive, and the cost is known up front.

Real Estate Development

THA defines Real Estate development activities to include modernization of the current portfolio, investigation and design of new affordable and market-rate development opportunities, along with redevelopment of properties that have outlived their useful life. THA also acts as its own developer in building of affordable housing and is in the process of expanding its role in the Tacoma community. THA's approach to these activities is to charge any activities related to the current stock of affordable housing or activities funded to one of the two MTW activity areas, as applicable. Any time that THA earns a developer fee as a developer or performs tasks as either a Public Development Entity (PDE) or a Public Development Authority (PDA), all revenues and expenses will be considered Business Activities (Non-MTW).

Based on historic and projected activities, the agency estimates that Development activities make up approximately 15 % of the agency support. This figure will be reevaluated annually based on the projects in the pipeline, the funding available to support the activities, and current staffing levels. THA is continually on the lookout for how to increase the affordable housing portfolio, and if opportunities arise, THA intends to use its MTW flexibility for development and rehab of affordable housing units.

Other Considerations
Personnel

Personnel costs are broken out a number of different ways, depending on which program(s) the staff support, where the funding for the positions comes from, and what the function of each position is.

Rent

THA's main office houses the agency's administrative support staff, the Rental Assistance Division and the Real Estate Development Department.   We used to break out rent separately as a line item in the budget and charge the different areas. This is now included in our Management Fee calculations.

Differences – HUD Asset Management vs. THA Local Asset Management

THA is required to describe any differences between the Local Asset Management Program and HUD's asset management requirements in its Annual MTW Plan in order to facilitate the recording of actual property costs and submission of such cost information to HUD:

1. THA is using a modified fee for service as outlined above. In addition to the fee, there are certain expenses (IT, Leasing, and Elderly service coordinator) that could have been allocated out, but as these expenses are not under the control of the Property Manager, we included in the fee structure charged out to the properties.
2. Under this plan, THA renamed its Central Office Cost Center (COCC) to the Program Support Center (PSC) and split it into the three different activity areas. In addition, the PSC will track the program management salaries that cannot be directly attributed to a specific project or program, and therefore would be allocated. The fees will be received in the PSC where the costs that would have been allocated out reside.
3. HUD's rules limit the transfer of cash flow between projects, programs, and business activities. THA intends to use its MTW resources and regulatory flexibility to move its funds and project cash flow among projects that support affordable housing without limitation and to ensure that agency operations best meet THA's mission and serve the agency's low-income clientele.
4. In determining the units to use for the basis of the fee, THA chose to use total units, regardless of occupancy status. This differs from the HUD Asset Management model where Housing Authorities are only allowed to charge management and bookkeeping fees for occupied units in each property. THA chose to deviate from the rule for two reasons: 1) THA believes that charging a for an unoccupied unit will serve as an incentive to the staff to get the unit leased because the program/property is paying a fee on a unit that is not occupied ; and 2) doing so will allow the administrative staff to budget on a known fee amount, along with covering overhead incurred by the agency whether a unit is leased or not.
5. Under the HUD Asset Management Model, the COCC financial information is reported as Business Activities. In THA's LAMP, each activity area has its own Program Support Center (PSC), which is the equivalent of the COCC, and the PSC's that support MTW will be included in the MTW Demonstration Program and the Business Activities PSC will be included in Business Activities column on the FDS.

Program Support Allocation Detail - The following chart is based on the information in place at the time of the plan. There may be some changes in property that will impact the actual information in 2021

Program Support Center Allocation Detail

Table 3: Total units & Program Support unit equivalencies

Cost Center	Funding Source	CAH (MTW) Unit Equivalent	Tax Credit (MTW) Unit Equivalent	Business Activities (Non-MTW) Unit Equivalent	Total Units
		Program Support Center Unit Equivalencies - 2021 Projected			
Rental Assistance	Mod Rehab SR0003			30	30
	Mod Rehab SR0002			41	41
	Section 8 Vouchers	3,543			3,543
	Life Manor TPV	150			150
	Hillside Terrace TPV	103			103
	Wedgewood TPV	48			48
	Tahoma House TPV	5			5
	FUP Vouchers			125	125
	Mainstream Vouchers			78	78
	NHT Vouchers			100	100
	VASH Vouchers			217	217
Rental Assistance: RAD Vouchers	RTH RAD Vouchers	456			Prop Mgt
	Bay Terrace 1 RAD Vouchers	26			Prop Mgt
	Hillside Terrace RAD Vouchers	33			Prop Mgt
	Salishan RAD units	290			Prop Mgt
Property Management: Tax Credit Partnerships	Hillside Terrace 1-2		46		46
	Hillside Terrace 1500 Blk		16		16
	Bay Terrace		70		70
	Bay Terrace 2		74		74
	Renew Tacoma Housing		456		456
	Arlington Youth Housing		58		58
	Court F (Rise at 19th)		64		64
	Salishan 1		90		90
	Salishan 2		90		90
	Salishan 3		90		90
	Salishan 4		90		90
	Salishan 5		90		90
	Salishan 6		90		90
Property Management: Local Fund Units	Salishan 7			91	91
3rd Party Managed - 50 % equivalency	Highland Crest -			36.5	73
	James Center North			15	30
	New Look		24		48
	Outrigger Apts.			24.5	49
	Prairie Oaks			7.5	15

Potential Purchase	Redwood Apts - 215 Units				
	Pine Tree Apts - 60 Units				
	Conifer Apts - 32 Units				
	Total Units/Unit Equivalents	*4,654*	*1,348*	*766*	*6,070*
Real Estate Development	THA MTW Support including CFP	227.75			228
	THA as Developer			683.25	683
	RED unit equivalents (15% of total units)	*227.75*	*0*	*683.25*	
	Total Unit Equivalents	*4,882*	*1,348*	*1,449*	*7,679*
	Program Support Center Equivalencies (% of All Units)	*63.57%*	*17.56%*	*18.87%*	*100%*

Appendix C: THA's Strategic Objectives with Performance Measures

1. Housing and Supportive Services

THA will provide high quality housing, rental assistance and supportive services. Its supportive services will help people as tenants, parents, students, wage earners, and builders of assets who can live without assistance. It will focus this assistance to meet the greatest need.

To meet this objective THA will:

- Strive to increase the number of households and persons receiving THA housing or rental assistance.

- Maintain an economic, racial, ethnic, language, age and differed abilities diversity that is reflective of our community.

- Provide the support and incentives necessary to help households to increase their household incomes.

- Help households get banked and build assets.

- Monitor the educational outcomes of students in our programs and provide interventions where necessary to help students succeed.

- Connect adult customers with education and employment services.

- Help households successfully exit THA's housing programs.

- Assess households on a scale of "in-crisis" to "thriving" and provide the services and referrals necessary to help households move to self-sufficiency.

- Regularly assess our service investments to ensure customers are satisfied and that the investments are offering the outcomes we hope for our customers.

2. Housing and Real Estate Development

THA will efficiently develop housing and properties that serve primarily families and individuals unable to find affordable and supporting housing they need. Its work will serve to promote the community's development. Its properties will be financially sustainable, environmentally innovative, and attractive.

To meet this objective, THA will:

- o Increase the number and type of THA units.

- o Improve the quality of housing that THA owns and manages.

- o Increase the life-span of the units within THA's portfolio.

- o Continue to develop and rehabilitate housing that is of award-winning quality.

- o Improve the cost effectiveness of THA's development function.

- o Assist in the development of affordable housing by other organizations.

- o Reduce the amount of THA dollars in each development and increase the amount of private and public investments.

- o Develop healthy and vibrant communities as measured by their incorporation of art and the walkability to community assets such as parks, schools, grocery stores, public transit and other community amenities promoting health.

3. Property Management

THA will manage its properties so they are safe, efficient to operate, good neighbors, attractive assets to their neighborhoods and places where people want to live.

To meet this objective, THA will:

- o Lower its per unit per year operating costs.

- o Increase its rent collection.

- o Improve each property's cash flow.

- o Maintain high quality properties.

- o Schedule and complete capital repairs on a regular schedule.

- Maintain a high level of customer satisfaction as judged by customer surveys.

- Consult with customers in advance of any policy changes 100% of the time.

4. Financially Sustainable Operations

THA seeks to be more financially sustaining.

To meet this objective, THA will:

- Achieve an agency-wide operating surplus.

- Maintain minimum and maximum restricted and unrestricted reserves.

- Achieve a 1.15 debt-service ratio.

- Increase the value of THA's land and properties.

- Increase and diversify its income.

5. Environmental Responsibility

THA will develop and operate its properties in a way that preserves and protects natural resources.

To meet this objective, THA will:

- Develop environmentally responsible properties.

- Develop communities that incorporate creativity and healthy place making.

- Reduce energy and resource consumption.

- Reduce the use of greenhouse emitting products.

6. Advocacy and Public Education

THA will advocate for the value of THA's work and for the interests of the people it serves. It will be a resource for high quality advice, data, and information on housing, community development, and related topics. THA will do this work at the local, state and national level.

To meet this objective, THA will:

- Strive to maintain a positive public regard for THA.

- Lend staff to serve as effective members of community advisory panels.

o   Be an effective advocate for the value of its work and the people it serves.

7. Administration

THA will have excellent administrative systems. Its staff will have skills that make THA highly efficient and effective in the customer service it provides to the public and among its departments. It will provide a workplace that attracts, develops and retains motivated and talented employees.

To meet this objective, THA will:

o   Improve its operating efficiency.

o   Lower its administrative costs per household served.

o   Increase the number of households served per full time employee (FTE).

o   Decrease the average amount spent on community service per client outcome.

o   Increase its employee engagement scores.

o   Decrease its staff turnover.

o   Maintain positive audit results.

Embedded within each objective and strategy are unavoidable tradeoffs in the face of flat funding, increasing need and tightening rental markets. For example, a dollar spent on increased rental assistance or supportive services means serving fewer households, less support for leased housing and its tenants or weaker administration and customer service. THA can feel very confident about its judgment and the tradeoffs they denote. Yet some of them, like limits on rental assistance or increases, may not be occasions to celebrate. We may not have made some of those choices if Tacoma did not face an affordable housing crisis or if THA was flush with resources to meet it. Yet THA, in consultation with our community, will make these choices with the market we face and the resources we have. Within those constraints, THA feels proud and excited about these objectives and the path they set for its work and its city. MTW flexibility makes this work adaptable and innovative and helps give meaning to each of THA's seven strategic objectives.

Appendix D: THA's Emergency Operations

As learned through the COVID-19 pandemic THA may need to implement temporary changes to its activities to ensure continuity of operations and respond to the needs of THA staff, participants and the general public. Emergency Operations may be implemented as needed when an emergency has been declared under national, state, local or Executive order. During that time, THA may use any of the following strategies to respond to the needs of the agency and our clients. They will be implemented as needed and as temporary activities under times of duress.

- **Defer end of participation dates:** Under normal circumstances, when a family reaches the end of their program term they are no longer eligible for assistance. This will allow us to continue to provide assistance to families who would have their assistance terminated for non-violation related reasons during a time of crisis.

- **Extend Regular Recertification Due Dates:** A recertification is due on a regular schedule. During a recertification, we need to collect and verify household and income information to make sure households are still eligible for housing. We propose to push back recertifications by one year that are due during a time of crisis so that households and our staff can focus on immediate needs and health and safety.

- **Emergency Verification Policies:** At the time of a recertification, we have to verify income information. This means that people have to give us hard copies of their paychecks, benefit letters, etc. As we see with COVID, it can be difficult to get this information as well as submit this information. During times of crisis, we propose to make income verification easier for everyone by accepting self-certifications over the phone, by e-mail or other means.

- **Remove 90-day and 20% rule for Interims:** For households with a Section 8 voucher, their rent is based on their income. During normal operations, we only process an interim (change in their rent) if they have lost at least 20% of their household income and that decrease is expected to last more than 90-days. We propose to remove those requirements so that families can find relief during a crisis.

- **Defer HQS Inspections:** Inspections require in-home visits and can require more than one trip to a single residence. During a time of crisis, we propose to defer regular and quality control HQS inspections to the household's next scheduled inspection date. This means that THA may accept a landlord's self-certification that the unit meets HQS or putting off these inspections until we have recovered from the crisis or until the next regular inspection is due, whichever is sooner. For quality assurance (QA) purposes and to retain program integrity, THA will increase its QA inspections and run targeted inspections on units with past of frequent HQS deficiencies.